Chapter 8 Public/Agency Comments and Responses

BPA released the Preliminary Environmental Assessment for a 30-day public and agency review in May 2000. During that time, BPA received comments orally, via email, and by letter. In addition, BPA received comments at a public open house held in the City of North Bend, Washington on Monday, June 5th, mid-way through the comment period.

All comments received during the review period, as well as those that came in following "close of comments," are contained in this chapter, organized by chapters in the Preliminary EA.

As a result of the comments received, changes to the Preliminary EA have been made in this Final EA. Substantive changes to the document have been underlined. Since this is an entirely new chapter, the text has not been underlined so that it is easier to read.

PURPOSE AND NEED (CHAPTER 1)

Comment 1-1: Tanner's load is all for commercial customers and not for the benefit of the people.

Response: Tanner's customers are 80 percent residential and 20 percent small commercial businesses. Tanner has no large commercial customers.

Comment 1-2: Who are Tanner's customers?

Response: See response to Comment 1-1.

Comment 1-3: What business structure does Tanner Electric operate under?

Response: Tanner Electric is a electric cooperative with a nine member board of directors who set policy and approve rates, and a general manager who is responsible to accomplish the work that needs to be done. As an electric cooperative, the customers share in the ownership of the company.

Comment 1-4: *Is this project just to meet current load?*

Response: No, the proposed project is needed to meet Tanner's current load and both Tanner and Puget's future loads in the North Bend area.

Comment 1-5: How long will the capacity needs be met with the new line?

Response: The proposed line should meet Tanner and Puget's needs well into the third decade of the 21^{st} Century.

Comment 1-6: Will there be a justification for running yet another power line (in the area) in the near future?

Response: BPA proposes to build a new end point at BPA's Echo Lake Substation for the existing Shultz-Raver No. 1 500-kV transmission line in 2002. This project, named the Kangley-Echo Lake Project, is currently under environmental review. BPA has no plans for any other transmission line in the local area at the present time. If the need arises for an additional transmission line, BPA would notify the affected public of the need for the line prior to initiating any environmental review.

Comment 1-7: We are concerned about getting a guarantee that in the future, more huge (power) lines will not come through and all the trees will be gone.

Response: While BPA cannot promise that no new power lines would be located in the area in the future, BPA can promise that we will inform the affected publics and government agencies as early as possible when we have identified a need for a project that would impact the community.

ALTERNATIVES INCLUDING THE PROPOSED ACTION (CHAPTER 2)

Comment 2-1: What route has been selected?

Response: BPA has not yet selected any route. The decision to build the line has not yet been made. BPA proposes to build a transmission line along a proposed route as identified in Section 2.1.1 Proposed Line Route of this EA, but any decision to build the line would be made following the completion of the environmental review.

Comment 2-2: The preferred route appears to be the same corridor that was proposed by Puget Sound Energy in their clearing permit application to DDES in 1997 for this project.

Response: The proposed route generally follows the same corridor that was proposed by Puget, however, the specific placement of the line differs from that proposed by Puget along SE 356th Avenue and within the City of North Bend.

Comment 2-3: What are the load limits of the existing substation?

Response: Tanner is presently served out of Puget's North Bend Substation. The substation cannot be expanded because Puget's existing transmission line that serves North Bend Substation is being operated "at capacity." If capacity were available on Puget's line serving the substation, additional power could be made available to Tanner Electric without the need to build a new substation and a new transmission line in the North Bend area.

Comment 2-4: *Is the proposed transmission line going to be undergrounded?*

Response: No, BPA is no longer considering undergrounding the transmission line. BPA did consider undergrounding a portion of the transmission line along the North Bend Way right-of-way at the request of landowners in the area. However, this alternative was rejected due to the high cost of placing the line underground (see also Section 2.3.2 of this document).

Comment 2-5: *How wide will the swath be for the right-of-way?*

Response: The right-of-way on private land would be 15 m (50 feet) wide. See also Section 2.1.3, Proposed Right-of-Way.

Comment 2-6: I do not want the line on my property. Why can't it be moved to WRECO property?

Response: BPA has sited a portion of the right-of-way within the existing 46 m (150-foot) wide BPA right-of-way, before jogging to the west at the point where SE 356th Avenue also jogs to the west. From the point where the right-of-way jogs to the west, the proposed right-of-way would be on WRECO property. Siting the right-of-way along the proposed alignment has a number of benefits over locating the line elsewhere in the project area. It uses a vacant portion of an existing right-of-way, minimizing the amount of new right-of-way that would need to be purchased. It would minimize the amount of clearing that would be needed for the right-of-way since it would use an already cleared area (SE 356th Avenue); and it preserves the landscaped buffer for those properties in the southern half of Section 36, though some danger trees may need to be removed from this buffer area.

Comment 2-7: Why can't the line go on Weyerhaeuser property?

Response: BPA considered locating the line on Weyerhaeuser property across the Snoqualmie Ridge Business Park. However, this alternative was dropped from further consideration due to the cost of acquiring land within the business park (see also Section 2.3 Alternatives Considered but Eliminated, and Section 2.3.1 Alternative Route Segments, Segment A [Quadrant Alternative]).

Comment 2-8: Why don't you build along the existing line (Puget's Snoqualmie-North Bend Line)?

Response: When the need for the proposed action was first identified, a number of alternatives in or near the City of Snoqualmie were considered that used existing Puget rights-of-way or corridors. These were dropped for various reasons early in the process. Included in the options considered was expanding the Snoqualmie Substation and building the line through the City of Snoqualmie. At the time Puget explored a number of alternatives to meet Puget's and Tanner's need, BPA supported Puget's findings and determinations about why these various options were unreasonable. This led to Puget, Tanner and BPA entering into a settlement agreement, entitled the North Bend Settlement Agreement, as outlined in Section 2.1, Proposed Action.

Comment 2-9: What about building from Snoqualmie southwest to Weyerhaeuser Snoqualmie Mill?

Response: Please see response to Comment 2-8.

Comment 2-10: Look at an alternative through golf course, past welding shop?

Response: Please see response to Comment 2-8.

Comment 2-11: Why don't you consider utilizing Puget's Snoqualmie Lake line and then follow Cedar Falls-Snoqualmie line? We have no basis to compare to other alternatives. Double-circuit alternative above should be included in the EA.

Response: Puget considered tapping the Cedar Falls-Snoqualmie transmission line early on, but dropped the alternative from further consideration because the line serves 30 taps between the two substations. Also, building a second transmission line in the same right-of-way, i.e., constructing a double-circuit line, presented a reliability issue with respect to both lines going down in the same event. See also response to Comment 2-8.

Comment 2-12: I haven't seen a cost comparison of all the alternatives in the EA. This should be included.

Response: BPA did not identify costs of all the alternatives. Some alternatives (segments) were removed from further consideration because of costs (Segment A, and the Underground Alternative) and others for environmental/technical concerns (Segments B, C, D, E, F, G and H). See Section 2.3 and Comment 2-8.

Comment 2-13: D Creek has been so trashed by Snoqualmie Business Park Park, I don't know why clearing around D Creek carries such weight.

Response: The alternative segment to the proposed route (Segment A, Quadrant Alternative) was dropped from further consideration primarily due to high land costs within the business park. A second reason the alternative segment was dropped was because it required more clearing over D Creek than would be needed if the right-of-way were to share a portion of BPA's existing Echo Lake-Monroe right-of-way across D Creek.

Comment 2-14: Cost/benefit comparison done in a balanced way: that political issues are called political issues (not written over) that's what I would really like to see. Use same criteria for all alternatives.

Response: Please see responses to Comments 2-8 and 2-12.

Comment 2-15: *Why can't the transmission line be buried?*

Response: BPA considered burying a portion of the transmission line within the North Bend Way right-of-way, but this alternative was eliminated from further consideration due to high costs (see Section 2.3.2 Underground Alternative, under Section 2.3 Alternatives Considered but Eliminated).

Comment 2-16: City of Snoqualmie - Future utilities will be undergounded. Can you go around the downtown area?

Response: Our understanding is that all new utilities within the City of Snoqualmie are to be placed underground, not only in the downtown area.

Comment 2-17: Why were alternatives not discussed in more detail?

Response: BPA has prepared this EA under the National Environmental Policy Act of 1969, as amended. EAs are intended to be concise environmental documents that

are prepared to determine if the action, as proposed, would create any significant or potentially significant environmental impacts. None were found. If significant impacts were identified, BPA would be required to write an environmental impact statement, and analyze a reasonable range of alternatives in detail.

Comment 2-18: The EA should more thoroughly consider some of the excluded alternatives depicted in Figure 4, particularly Segment F.

Response: See Comments 2-8 and 2-17.

LAND USE (CHAPTER 3)

Comment 3.2-1: Would BPA move one of the steel structures (on the Echo Lake-Monroe) 500-kV line) in the project area?

Response: Yes, one of the steel structures supporting the Echo Lake-Monroe 500-kV transmission line would need to be moved to accommodate the crossing of the proposed line under the higher voltage line. The steel structure would need to be relocated about 15 m (50 feet) to the south, and also would need to be raised from 4.5 to 7.5 m (15 to 25 feet). BPA would work with the landowner to relocate the structure.

Comment 3.2-2: The road in dry season gets dusty, and during the wet season it gets hydraulic seepage and it gets real boggy.

Response: Dust abatement is a requirement in BPA's construction specifications and is the responsibility of the contractor. Dust abatement would either be undertaken as needed through use of a watering truck, or would be handled by a one-time application of cellulose slurry designed for that application. The contractor's charge would be to prevent any fugitive dust from leaving the work site in measurable quantities. The method used would be the contractor's decision. During wet periods, BPA would lay down rock on any new or existing access road where rock would be required, such as in seepage areas. Roads would be designed to prevent rutting.

Comment 3.2-3: Can speed control be put into easement agreement for access road?

Response: BPA would include safety measures in contract specifications to address residents' concerns.

Comment 3.2-4: *My fence was bent down at the top and split in the middle by BPA's surveyors. I want it fixed.*

Response: BPA regrets that any damages were created. If any such damages were caused by BPA personnel or its contractors, BPA would return the property to its former condition.

Comment 3.2-5: The access gate to the Echo Lake-Monroe transmission line right-of-way was torn off at its hinges, and another gate appeared in its place. Also the BPA lock was on the chain that had been cut.

Response: BPA will look into the matter and follow up with the landowner.

Comment 3.2-6: I would like the stumps removed and my pasture back bladed, and all wood debris removed from my property.

Response: BPA would consider removing the stumps of trees cleared as a part of this proposed project. With regard to back-blading the pasture, if agricultural soil is compacted by construction, the contractor would be responsible for returning the parcel to its preconstruction condition, which may involve subsoiling the affected parcel. The contractor would also remove wood debris, as requested by the landowner.

Comment 3.2-7: I think the access road (96th Way) is half on my property and half on my neighbor's property.

Response: Comment noted.

Comment 3.2-8: There is a 1/2-inch water main coming from Quadrant property as mitigation (to another project). The property owner wants BPA to make sure that this fact is referenced in the contract specifications as an existing utility line to be avoided.

Response: BPA's contract with the contractor would include a clause that requires the contractor to locate buried utilities. BPA would include the water line in the contract specifications as an area to be avoided.

Comment 3.2-9: Glad that the existing steel tower (Structure 2/4 of the Echo Lake-Monroe line) would be moved further away from my driveway.

Response: BPA would work with the landowner to site the steel structure so that the new location would meet the needs of both BPA and the landowner.

Comment 3.2-10: No longer happy with moving the line west of the road. Now want it moved way onto WRECO property.

Response: BPA has proposed an alignment along the westside of SE 356th Avenue. Siting the facility adjacent to SE 356th Avenue would also use an already cleared area (for SE 356th Avenue). Moving the proposed right-of-way farther to the west would create an adverse land use impact because it would create a slice of unusable land. Moving the proposed right-of-way farther west would also require additional clearing and other costs that could be avoided using the proposed alignment.

Comment 3.2-11: Concerned about any damages (intentional or unintentional) that would occur during project construction.

Response: BPA holds the contractor liable for any damages caused by its action or inaction associated with project construction, should the project be implemented. BPA would have a construction inspector on duty at all times during project construction. Any problems associated with safety or damage to real or personal property associated with project construction should be brought to the inspector's attention as soon as possible.

Comment 3.2-12: Concerned about the culvert's ability to withstand weight of heavy equipment. Our utilities go through there, and when the road washes out, we lose power.

Response: BPA would reinforce any existing access road where rights would be acquired to use the road. The reinforcement would accommodate the heavy weight of construction equipment. BPA would inspect this culvert to avoid any damages. If the culvert would need to be replaced or the road reinforced prior to construction, the work would be undertaken after talking with the landowner.

Comment 3.2-13: *Pickups with dual tires create ruts in our road that funnel water onto the road.*

Response: BPA appreciates this information. This access road may need to be reinforced if BPA acquires rights from the landowner to use this access road for construction and maintenance.

Comment 3.2-14: What is the length of the construction season? What are the hours of operation? We don't want to be sitting for a half an hour trying to go to work while trucks get out of the way.

Response: Due to the mild winters in central King County, the length of the construction season would likely be year-round. Normal hours of operation during the fall are 7:00 am until dusk, Monday through Friday. Some work may continue into Saturdays, but Saturday work is not part of the normal workweek. BPA would include requirements in the construction specifications to direct traffic according to the Uniform Traffic Code and to not unduly delay local traffic.

Comment 3.2-15: We have safety concerns about logging trucks and construction equipment during construction.

Response: BPA is also concerned about safety. The contractor selected would be required to use caution in conducting work. BPA's construction inspector during project construction should notice unsafe operation of any vehicles or equipment. Any safety violations would be brought to the contractor's attention immediately, and also logged into the construction inspector's daily report.

Comment 3.2-16: Are you going to increase the width of the existing access roads?

Response: The access roads used for project construction need to be a minimum of 3.6-m (12-feet) wide, and wider at turns. Depending on the severity of the radius of the turn, the width of the roads at these locations could be as much as 6 to 6.7 m (20 to 22 feet).

Comment 3.2-17: What about rebuilding the roads, putting in ditches, gravel etc.?

Response: BPA prefers to use existing access roads rather than constructing new roads. It is less expensive, and impacts the environment less. Where any improvements would be needed to use existing access roads, BPA would make such improvements. This may include putting in ditches and culverts and bringing in additional gravel.

Comment 3.2-18: *How would BPA address dust abatement?*

Response: See response to Comment 3.2-2.

Comment 3.2-19: We want speed limitation during construction. Concerned about dust, and the safety of our dogs and children.

Response: BPA requires the contractor and any subcontractors employed on the job to operate all equipment and vehicles in a safe manner. BPA can put traffic requirements into the construction specifications. Any violations of the requirements would be noticed by the BPA construction inspector on-site, and would be brought to the contractor's attention immediately. BPA would also appreciate any notification by residents, should anyone notice any apparent violation of safety concerns related to project construction activities.

Comment 3.2-20: *Some residents are concerned that Puget and/or other utilities would be allowed to underbuild without buying the rights from the landowners.*

Response: No utility would be allowed to hang any utility line on BPA power poles without first obtaining permission from BPA and the underlying property owner.

Comment 3.2-21: We want some type of agreement limiting use to access roads only and no other portions used for turnarounds. Don't want equipment turning around in our driveway.

Response: BPA and its contractors are only allowed on private property where access rights have been acquired. Occasionally, BPA personnel or its contractors could be faced with the need to turn around at a location where no rights have been acquired (a driveway, for example). BPA would caution the contractor about the sensitivity of this issue in the project area, particularly with respect to individual landowners who have let BPA know of their concern. BPA and its contractors would respect the landowner's wishes and only use those access roads where rights have been secured.

Comment 3.2-22: We want limited intrusion into our property.

Response: BPA and its contractors would abide by the wishes of the landowner. See Comment 3.2-21.

Comment 3.2-23: Certificate of Segregation on WRECO property in Section 35, south of the Quadrant Business Park. There are 20-acre tracts that were monumented by ESM of Federal Way. The contact at ESM is Cindy Flood, 253-838-6113.

Response: Comment noted.

Comment 3.2-24: Last year they went into these 20-acre tracts and did clearing and road improvement for a thinning contract next year.

Response: Comment noted.

Comment 3.2-25: We have updated wetlands delineation, mapped and a new topographical map, but no significant tree survey.

Response: Comment noted. BPA appreciates receiving this information.

Comment 3.2-26: Along the section line between Sections 35 and 36, we anticipate a buffer for Snoqualmie Ridge Phase II or JPA (Joint Planning Area) between King County, City of Snoqualmie and WRECO. We have begun the annexation process into Snoqualmie and we will physically begin the infrastructure within three years.

Response: Comment noted. If BPA decides to go forward with the project, as proposed, the BPA transmission line would be an existing feature at the time the land would be developed.

Comment 3.2-27: Extending Douglas Road into Section 36 will require an extensive public process. The developers (Connor Homes) have just recently been delayed again by Snoqualmie's requiring them to find alternative access.

Response: Sufficient clearance would be provided in the design of the line to accommodate a public right-of-way beneath the line, should one be dedicated in the future.

Comment 3.2-28: Waterline into Jay Dutczak's property is a 2-inch line, the meter is on Quadrant property. WRECO gave Mr. Dutczak an easement across Quadrant from the meter east to his property line. The design map and the ditch where Jay installed his waterline are not matching. We will need to find out where it is and change the map. We also need to add the waterline to the land use agreement that will be issued to the City of Snoqualmie for Weyerhaeuser's Snoqualmie Ridge Project.

Response: BPA appreciated being notified of the existence of this waterline and also that the location of the water line differs from where it is purported to be on the design drawings. BPA would identify the proper location of this waterline in the field and also alert the contractor in the construction specifications as a caution, should the line be built.

Comment 3.2-29: *Dollars don't matter, i.e.,* \$10,000 *is not enough; maybe one million would be enough.*

Response: BPA pays fair market value for any rights secured, and the value is established during the appraisal process.

Comment 3.2-30: *Not interested in selling any more easements on their property. We just want to be left alone.*

Response: Comment noted. BPA understands that not all property owners along the proposed alignment are willing to sell BPA an easement across their property. Any rights obtained across such properties would need to be acquired through the condemnation process.

Comment 3.2-31: Are there any plans for a substation at the crossing of BPA's 345-kV line and Puget's 115-kV line?

Response: We assume the commentor is referring to the crossing of Puget's Snoqualmie-Lake Tradition No. 1 115-kV transmission line and BPA's Echo Lake-Monroe 500-kV transmission line near the tap point of the proposed project. For more information, please see Section 1.3, Other Projects in the Area, Puget Projects.

Comment 3.2-32: Why is there a jog in the 115-kV line along the 500-kV right-of-way?

Response: There is a jog in the 115-kV line so that the line could be located on the west side of the SE 356th Avenue in the southern half of Section 35, near the City of Snoqualmie. The alignment was chosen after conferring with a number of the affected landowners in this part of the project area, including representatives of the Weyerhaeuser Corporation. The alignment on the west side of the SE 356th Avenue preserves the landscaped buffer between the homes east of SE 356th Avenue and the road, and it takes advantage of the already cleared area where SE 356th Avenue is located, minimizing the clearing that would otherwise be required.

Comment 3.2-33: *Vehicles will not be allowed off roads. Who will enforce this?*

Response: Project related motorized vehicles are required to use only those access roads on private property where rights have been obtained. This would be enforced by the BPA construction inspector.

Comment 3.2-34: Concerned that our open area by the game trail will be used as a turn-around and we don't want them to use this area since BPA has not obtained rights to be there.

Response: BPA and its contractor(s) are required to use private land only where BPA has acquired land rights. BPA's standard language in the construction specifications require the contractor to stay on those private roads where rights have been obtained by BPA.

Comment 3.2-35: We have an existing culvert that keeps the road open; we don't need it blocked by debris.

Response: If BPA acquires rights to use this road, BPA or its contractor, would ensure that the culvert not be blocked with debris associated with construction related activities.

Comment 3.2-36: Will you need to strengthen crossing over culvert to handle heavy construction equipment/vehicles just before Gordon's driveway?

Response: BPA would make road improvements, where necessary, on private roads where land rights have been obtained. Where culverts need to be reinforced, BPA would do what is necessary, after first conferring with the landowner about what improvements need to be made.

Comment 3.2-37: You're establishing a whole new right-of-way and not taking advantage of utilizing the existing right-of-way.

Response: From the tap point south, over a distance of approximately 1000 m (0.6 mile), BPA would use the western 8.4 m (27 1/2 feet) of the existing 46 m (150 foot) wide Echo Lake-Monroe 500-kV transmission line right-of-way. In addition, BPA would use existing public road rights-of way over half of the existing 7-km (4.5-mile) right-of-way between the proposed tap point and the proposed substation site. State, county and city rights-of-way would be used.

Comment 3.2-38: *I believe the line should be moved farther west onto Weyerhaeuser property since it doesn't affect landowners.*

Response: BPA sited the proposed transmission line in the southern half of Section 35 to minimize land use impacts to the developed and undeveloped land use resources. See also response to Comment 3.2-10.

Comment 3.2-39: There's an obligation to explain rationale of decision-making process. That should be done in a public way, a public gathering, assuming you haven't made a final decision! There would be negative public relations to deal with. The EA doesn't do this (any cost comparisons). A business would have to clearly lay this out.

Response: BPA has prepared this environmental assessment to determine if the action, as proposed, would create any significant environmental impacts. With mitigation, the proposed action was found to create no significant environmental impacts; therefore, BPA is issuing a Final EA and Finding of NO Significant Impact (FONSI). The agency can select the action, as proposed, or select the No Action Alternative. Whatever decision BPA makes on the proposed action, it will be documented and published in a document known as a Decision Record, a copy of which would soon be available, following the completion of the environmental review.

Comment 3.2-40: *I'm sure BPA is concerned about budget, but landowners are concerned about how the (proposed) project impacts them.*

Response: BPA is concerned about the costs of the proposed action, as well as how the human environment would be impacted. BPA prepared this environmental assessment to identify impacts to the human environment, and to determine if the proposed action would create any significant or potentially significant impacts on the human environment. With mitigation, none were found, and BPA has prepared a Finding of No Significant Impact.

Comment 3.2-41: *Where is the animal crossing located?*

Response: The Preliminary EA did not identify this landmark on any of the figures. Please see Figure 2 in this document for the location of the animal crossing under the east and west bound lanes of I-90.

Comment 3.2-42: What would be the length of the access road on the Thompson's property?

Response: BPA proposes to construct an access road on the Thompson property. The access road would be approximately 460 m (1500 feet) long.

Comment 3.2-43: Question the accuracy of the photomap and other maps which seemed to show the proposed transmission line alignment on Quadrant property (Snoqualmie Ridge Business Park).

Response: BPA has prepared a blow-up of the detail of the proposed right-of-way along S.E. 356th Avenue (see Figure 7). The figure shows the proposed right-of-way in relation to the existing 500-kV transmission line, the section line and the buffer area on Quadrant property. The figure also illustrates the alignment of the proposed transmission line right-of-way at the point the line jogs to the west to be located on Weyerhaeuser property in Section 35.

Comment 3.2-44: What are the chances of you arranging the poles so we don't have one directly in front of our gate. A few feet to the north and you are on developer's property (and potentially future city property since the property north of us could be subject to annexation in the future). Our property is protected and may not be annexed. We see our life style being threatened. Please let me know if there is anything you can do about the gate.

Response: BPA would work with the landowners whose property would be affected. With the exception of the need to place wood pole structures at specific locations at angle points, BPA would be able to move structure locations along the proposed alignment to mitigate land use impacts to the affected property owners.

Comment 3.2-45. SE 96th Way can't be closed or blocked at any time. It's the only way in and out of the Gordon property.

Response: The contractor would be made aware of the households who use SE 96th Way as their only ingress and egress to their property in the terms and conditions of the contract, and also during the preconstruction briefing with BPA personnel, including the construction manager, construction inspector and land representative. The contractor would have no need to close or block SE 96th Way at any time.

Comment 3.2-46: The EA should clarify the difference between the original easements compared to the new easements (activities that can be conducted).

Response: Although the original easements are not identical, they include the following rights: the perpetual right to enter and erect, maintain, repair, rebuild, operate, and patrol one line of electric power transmission structures and appurtenant signal lines, including the right to erect such poles, transmission structures, wires, cables, and appurtenances as necessary, in over, upon, and across the right-of-way. There are a few exceptions; one easement has the right for one or more lines (rather than being limited to one line of structures). Two easements contain slightly different wording as follows: the right to construct, maintain, repair, rebuild, operate, and patrol one line of electric power transmission structures with conductor and necessary appurtenances over and upon the right-of-way.

All the original easements have the present and future right to clear the right-of-way and keep the same clear of brush, timber, structures and fire hazards, provided fire hazards shall not be interpreted to include any growing crops other than trees. There are a few exceptions: (1) where an easement provides language that fire hazards shall not be interpreted to include any growing crops other than trees over 4.5 m (15 feet) high; (2) where an easement provides slightly different language as follows: the right to clear the right-of-way and keep the same clear of brush, timber, structures, and fire hazards, provided that the words "fire hazards" shall not include annual agricultural crops, and to dispose of such brush, timber, and structures in such manner as shall not create a fire hazard; and (3) where easements have no future danger tree rights; and/or easements which have future danger tree rights within restricted cutting areas; compensation for future danger trees within the described strips of land was included in the consideration paid for the right-of-way.

Most of the original easement documents were limited to the right to construct one line of structures. BPA's new standard easement documents include the rights for one or more electric circuits of any voltage and any communication lines or equipment and appurtenances thereto.

BPA has sited a portion of the new transmission line right-of-way along the northern portion of S.E. 356th within the existing 46-m (150-foot) wide BPA right-of-way, before jogging to the west at the point where SE 356th Avenue also jogs to the west. Since the new structures would be located within the boundaries of the original easements that were limited to one line of structures, BPA would need to secure rights for the additional burden across these easements.

In regard to danger trees, the new easements are similar to the original easements except that the new easements would not limit future danger trees to restricted cutting areas. Compensation for present and future danger trees would be included in the consideration paid for the right-of-way.

Comment 3.2-47: A strip of trees left on SE 356th Avenue (where line veers west of existing right-of-way) will be subject to wind throw. This wasn't addressed in the EA.

Response: BPA is moving the line to the west in this location to accommodate one of the landowner's suggestion to retain the strip of vegetation between SE 356th Avenue and the existing BPA right-of-way. BPA has located the line along the west side of SE 356th Avenue, in part to comply with this request. BPA would not assume liability for the trees east of SE 356th (in this location) since they would be off the proposed right-of-way, on private property.

Comment 3.2-48: *I want stumps removed from the right of way if the project goes through.*

Response: Comment noted. BPA would consider removing the stumps of trees that would be removed from the right-of-way, should BPA decide to build the project.

Comment 3.2-49: There is an original road maintenance agreement on SE 356th Avenue.

Response: Comment noted.

GEOLOGY AND SOILS (CHAPTER 3)

Comment 3.3-1: Geologic hazard areas. Geologic hazard areas include erosion, seismic, steep slope and landslide hazard areas. Utilities may generally be allowed in geologic hazard areas, if, based upon a review of special studies, it is determined that the proposed construction will not subject the area to risk of landscape or erosion, or that risk from seismically induced settlement is minimized or eliminated. The geotechnical evaluation referenced in the EA should specifically address impacts of clearing and tree removal on steep slope hazard areas (greater than 40 percent) and landslide hazard areas, as it relates to long-term slope stability.

Response: Geologic hazard areas were addressed in the Engineering Geologic Recognizance (report) provided by Golder Associates. This study identified potential unstable areas along the power line alignment. Upon field review, these sites were determined to be free of active landslides and suitable for development, provided that best management practices (BMPs) be employed. Proposed BMPs include but are not limited to: minimizing grading and vegetation clearing, prompt revegetation of disturbed areas, limiting construction to the dry season (April through mid-October), and implementation of appropriate temporary and permanent measures to control erosion and run-off. In addition, the report recommended that a geotechnical engineer be retained to review the grading plans on cuts or fills greater than three feet high. BPA would implement these BMPs during project design and construction.

Although BPA's proposed alignment does not specifically follow the same alignment that was proposed by Puget, the transmission line generally follows the same alignment between the tap point and the proposed substation site.

Comment 3.3-2: The EA discusses construction of new access roads which would collect and concentrate surface water, and/or add new impervious surface areas. The proposed route is within or adjacent to numerous sensitive areas, the impervious surface thresholds likely would be exceeded, and collection and concentration of surface water may occur from road construction, therefore, an engineered drainage analysis should be prepared for this proposal addressing the eight core requirements in the King County Surface Water Design Manual.

Response: BPA would prepare an engineered drainage analysis for new access roads that would address the eight core requirements contained in the King County Surface Water Design Manual, and submit the drainage analysis to the King County Department of Development Services for their review and approval prior to the onset of construction activities.

Comment 3.3-3: Geology and Soils and Water Quality. Only short-term increases in erosion and runoff rates are acknowledged.

Response: The commentor is correct. BPA anticipates no discharge of pollutants to surface waters in measurable quantities as a result of the proposed action; therefore, no long-term impacts are anticipated.

Comment 3.3-4: Erosion concern where BPA will remove trees on Thompson property, adjacent to SE 96th Way (unstable slopes).

Response: BPA is also concerned about the erosion potential of this area, consequently, the clearing contract would state that it is important for the clearing contractor to not disturb the vegetation on the steep slope in this location. BPA appreciates the commentor's suggestions that this area needs to be protected.

WATER QUALITY (CHAPTER 3)

Comment 3.4-1: The increased runoff effect would be multiplied in that additional power supply will enable further development and clearing of perhaps 1600 acres (or more?) with an end result of much greater stormwater runoff. Increased runoff increases erosion, water pollution, flooding, and degrades fish habitat. These effects would be significant public loss with real economic costs.

Response: The Preliminary EA looked at the cumulative impacts of the proposed action when added to past, present and reasonably foreseeable future actions, with respect to the impacts on water quality and sediment loading of local streams. The EA stated that "Mitigation measures proposed for this project would reduce the chance of large amounts of sediment from entering surface waters. It is unlikely, therefore that the proposed action, when added to past actions, current proposals, and future developments would measurably contribute to degradation of the area's water quality."

Comment: 3.4-2: The proposed route will cross several wetlands and streams requiring clearing and tree removal within the sensitive areas. The EA did not

discuss the amount of clearing proposed within these sensitive areas, nor proposed mitigation to replace the functional loss of tree and vegetation cover within stream and wetland areas.

Response: Tree removal within stream and wetland areas would have minimal impact on the values and functions provided by these aquatic resources. Since the proposed transmission line would cross waters at nearly right angles and would be adjacent to existing rights-of-way, clearing would be kept to a minimum and would not fragment existing vegetation cover types. Only trees that pose a hazard to power line operation and maintenance would be removed. In most cases, low-growing streamside and wetland vegetation and shade-providing shrubs would not be removed. Disturbed areas would be restored and revegetated following construction with suitable vegetation. In addition, since the quantity of trees to be removed at stream and wetland crossings is minimal, the proposed project would not be expected to have a detrimental effect on water temperatures. Although impacts are expected to be minimal, any mitigation of adverse impacts would be conducted in accordance with conditions determined with the appropriate jurisdictional agencies.

Comment 3.4-3: Estimates of storm water runoff rates for roads and cleared land are 2 to 15 times that which occurs on forested land (up to 25 times if the land is paved) (references: Dinicola, Hartley, also King County Forest Stewardship course content, and Executive Ron Sims, remarks at Private Forest Summit 2000, March 29, 2000). For the acreage permanently cleared of forest for the proposed power line, a long-term increase in storm water runoff would occur. Dinicola, R. S., 1990. Characterization and Simulation of Rainfall-Runoff relations for headwaters Basins in western King and Snohomish Counties, Washington. USGS Water resources Investigations Report 89-4052, 52pp. And Hartley, D and J Burkey, 1997. Impact of timber harvest on stream flow in a low elevation Watershed. Presented at the third Annual WA-DNR Watershed Analysis Stampede, October 28-30, Pack Forest, Eatonville, WA.

Response: BPA acknowledges that more stormwater runoff would result for roads and other cleared areas than from forested areas. As indicated in response to Comment 3.3-2, BPA would minimize impacts to water quality by preparing an engineered drainage analysis for new access roads that would address the eight core requirements contained in the King County Surface Water Design Manual, and submit the drainage analysis to the King County Department of Development Services for their review and approval prior to the onset of construction activities.

Comment 3.4-4: How will this (proposed project) affect Cold Creek? Will sediment enter the creek?

Response: BPA would take measures to ensure that sediments would not reach any surface waters in measurable quantities, including Coal Creek. Therefore, no long-term impacts to Coal Creek are anticipated.

Comment 3.4-5: Concern for what we would do to Cold Creek?

Response: Please see Comment 3.4-4.

Comment 3.4-6: <u>Surface Water Management/Water Quality</u>. All development proposals that would add more than 5,000 square feet of new impervious surface would construct or modify a drainage system that collects or concentrates surface and stormwater runoff, or that contains, or is adjacent to, a floodplain, stream, lake wetland, or other sensitive area defined in KCC 21A.24 are required to satisfy the eight core requirements outlined in the King County Storm Water Design Manual (KCC 9.04.040). The proposed route crosses or is adjacent to several of these streams and wetlands.

Response: BPA would comply with this King County requirement, prior to the onset of construction activities. See Comment 4.3-3.

Comment 3.4-7: The EA discusses construction of new access roads which likely would collect and concentrate surface water, and/or, any new impervious surface areas. The proposed route is within or adjacent to numerous sensitive areas, the impervious surface area threshold likely would be exceeded, and collection and concentration of surface water may occur from road construction, therefore, an engineered drainage analysis should be prepared for this proposal addressing the eight core requirements in the King County Surface Water Design Manual.

Response: BPA would prepare an engineered drainage analysis and address the eight core requirements contained in the King County Surface Water Design Manual, prior to the onset of any construction activities. See Comment 3.4-3.

Comment 3.4-8: Geology and Soils and Water Quality: Only short-term increases in erosion and runoff rates are acknowledged.

Response: This is correct. BPA anticipates no discharge of pollutants to surface waters in measurable quantities as a result of the proposed action, therefore, no long-term impacts are anticipated.

Comment 3.4-9: We use well water so we don't want any herbicides used. This is our drinking water.

Response: BPA uses herbicides to control tall-growing vegetation on its rights-of-way in what is known as an integrated vegetative management program. Prior to using any herbicides, BPA would contact affected landowners to find out if they would have any concerns to herbicide use on or near their properties. BPA's policy on herbicide use in the vicinity of domestic/public drinking water wells is that a 50-m (164-foot) radius be implemented for any herbicide having a ground/surface water advisory, or 15-m (50-ft.) radius for any other herbicide.

Comment 3.4-10: *If you treat stumps, won't the herbicide leach into the drinking water?*

Response: BPA uses herbicides to treat cut stumps of deciduous trees to prevent resprouting, particularly cut stumps of big leaf maple. The herbicides are selectively applied to cut stumps, in limited quantities, by licensed applicators using a backpack and a hand-held applicator according to label instructions. This method of selectively applying herbicides prevents any herbicides from reaching groundwater. See also Comment 3.4-9.

VEGETATION (CHAPTER 3)

Comment 3.5-1: By enabling further development, the new power line would contribute to an even greater loss of forest vegetation.

Response: The proposed project is needed to ensure an adequate supply of electric power for Tanner's existing customers and to Tanner and Puget's future customers in the project area. Since new development on raw land may displace trees and other vegetation commonly found in the forest habitat, it could be said that the new power line would likely contribute to the loss of forest vegetation in the area in the future. However, since each of the affected jurisdictions (City of Snoqualmie, City of North Bend and unincorporated King County) has an adopted process for handling new development requests, mitigation measures would likely be placed on any proposed developments to minimize environmental affects, including those that affect forest resources.

While BPA is generally not subject to local development approvals on the proposed action, the transmission line and substation have been designed to minimize impacts on the human environment, to the maximum extent practicable. BPA has sited the facility to take advantage of existing rights-of-way (both utility easements as well as public road rights-of-way) to minimize the amount of clearing necessary. In addition, BPA is providing for the maximum amount of vegetation to be retained while maintaining the necessary electrical clearances as required by the National Electric Safety Code, should it choose to go forward with the project. Also, BPA is designing

the facility to accommodate other utilities should they acquire their own rights from the underlying landowners, an example of one-utility planning. As was stated in the Preliminary EA (Section 3.2.3), by implementing the one-utility planning concept with more than one utility uses a single set of utility poles, the amount of vegetation that would need to be taken to accommodate utility lines would be minimized.

Comment 3.5-2: *Wants right-of-way replanted after clearing.*

Response: BPA would reseed disturbed areas following the completion of construction activities. BPA discourages the growth of tall-growing vegetation on its rights-of-way and encourages the growth of low-growing vegetation. BPA would also replant critical areas with low growing and tall growing vegetation following the completion of construction activities.

Comment 3.5-3: Wants to see plan of how we will revegetate the area.

Response: BPA anticipates retaining the services of a plant specialist/arborist in addition to using Puget's publication on selecting the right species to grow near transmission facilities. BPA also anticipates preparing planting plans for those areas where mitigation would be needed, such as within the buffer area along SE 356th Avenue, within the I-90 right-of-way, along portions of North Bend Way, and in the vicinity of North Bend Way and Alm Way near and within the City of North Bend. BPA would also reseed all disturbed areas following the completion of construction activities.

Comment 3.5-4: *Wants vegetation mitigation.*

Response: See Comments 3.5-2 and 3-5-3.

Comment 3.5-5: Removing danger trees only where necessary is a meaningless statement. No commitment provides that 100 feet won't be cleared of all tall trees, including conifers.

Response: BPA is attempting to save as many trees as possible adjacent to the proposed right-of-way. BPA's forester is aware of the sensitivity and the emotions associated with the need to remove vegetation to construct and operate the line in the project area.

While yesterday's clearing policy took out every danger tree that could hit a specific line with the addition of 15 years of growth, today's clearing policy is tempered with things we have learned from our maintenance criteria that incorporates local knowledge into our decisionmaking. Today we take into consideration local wind

patterns, intensity and frequency of storms, and whether they are usually accompanied by ice, snow, rain, or high winds. We also look at what types of trees have blown down in the area in the past, and their direction of fall. Additionally, we look at soil conditions, the existence of any root rot problems as well as other site characteristics. We have become very knowledgeable about understanding the growth characteristics and behavior patterns of the tree species found in our service area. For example, we understand that Western hemlock are shallow rooted, that black cottonwood tends to be brittle and breaks easily, that red alder and big leaf maple also break easily in heavy wet snow and during ice storms. We understand that lodgepole pine bends under heavy snow or ice loadings, and any tree with a defect or that leans toward a transmission line would be considered a potential problem tree.

BPA would modify its clearing policy both within the proposed right-of-way as well as its policy with respect to danger trees off of the right-way on this proposed project. In this way, BPA would assume much more risk for tree-caused problems because more trees that could possibly hit the line if they fell would be left. While normally the entire right-of-way would be cleared of vegetation, BPA is putting into the clearing specifications that only the wire zone, i.e., the area over which the conductor would swing, would be cleared, which would preserve some of the lower growing vegetation between the wire zone area and the edge of the right-of-way. In steep slope areas, such as the one along 96th Way, the forester is recommending that none of the salmonberry along the steep slope on the Thompson property be taken. Similar clearing criteria would be spelled out for other steep slopes or sensitive areas such as those along the wetlands associated with Kimball Creek, within the North Bend Way right-of-way.

Comment 3.5-6: The environmental impact of removal of danger trees can't be determined until the danger trees have been positively identified; however, the verbal identification of such trees on our property by Kathy Stephenson (BPA forester), suggests that many tall trees, including conifers, within our property would be condemned (some of those trees in sensitive areas, in wetlands and on steep slopes). The EA doesn't address the negative impact of removing these trees (increased visual and noise pollution, loss of many public benefits that trees provide) nor does it include the removal of these trees in the estimate of cleared land. Mitigation with replanting of native shrubs and low or slow growing conifers would be necessary, but is not offered.

Response: Geologic hazard areas were addressed in the Engineering Geologic Reconnaissance report provided by Golder and Associates, entitled <u>Tanner Tap Project, Engineering Geologic Reconnaissance, North Bend, Washington, March 26, 1998. This study identified potential unstable areas along the power line alignment. Upon field review, these sites were determined to be free of active landslides and suitable for development, provided that best management practices be employed. Proposed BMPs include but are not limited to: Minimizing grading and vegetation clearing, prompt revegetation of disturbed areas, limiting construction to the dry</u>

season (April through mid-October), and implementation of appropriate temporary and permanent measures to control erosion and run-off.

With respect to any "noise pollution" caused by the proposed project, BPA retained the services of an acoustical engineering firm, MFG of Lynnwood, Washington, to undertake an environmental noise analysis of the proposed action of building the transmission line and substation. The analysis looked at the impacts of clearing vegetation, including danger trees, between noise sensitive properties and major arterial road, I-90 and North Bend Way. The reports' findings were that the proposed substation would meet both the City of North Bend's noise ordinance as well as King County's, and the increase in sound levels at all potentially affected residences due to the removal of trees and shrubs would not likely be discernable. Therefore, the proposed project should not result in any significant noise impacts.

With respect to including the danger trees in the amount of acres that would need to be cleared for the proposed project, BPA feels that such a figure would be misleading in that only individual trees are identified as danger trees (see also Comments 3.5-5 and 3.5.7).

Comment 3.5-7: Whether or not the sixteen acres estimated to be cleared includes the land where danger trees would be removed is not specified in the EA. If it does not, the effective area of clearing is greater than 16 acres. Mitigation by replanting with native shrubs and low or slow growing conifers where possible would reduce, but not eliminate this impact.

Response: Danger trees are not included in the 6.5 hectares (16 acres) that BPA has identified that would need to be cleared for the proposed project. Individual danger trees would be in addition to the 6.5 hectares (16 acres). BPA is aware that it cannot mitigate all impacts associated with development projects, only those that would reduce potentially significant impacts below the level of significance.

BPA proposes to provide low-growing and tall-growing vegetation in certain areas to mitigate specific impacts where those impacts have been identified, i.e., certain properties that would have the screening removed between arterial roadways and their residences such as some properties along North Bend Way, within the I-90 right-of-way, at the request of the Greenway Trust and the Washington State Department of Transportation, at the entrance to North Bend where vegetation would be removed, and within the 50-foot buffer area in the City of Snoqualmie.

Comment 3.5-8: Vegetation: The tall growing conifers along I-90 within the proposed 50 foot easement for a new powerline include a number of trees with diameter (dbh) greater than 36 inches. At least one Douglas fir tree in the proposed easement adjacent to our property is more than 41 inches dbh. Also, removal of danger trees may not be included in the estimate of vegetation loss, and if not, would

represent a significant additional loss. Mature trees provide many economic as well as aesthetic benefit. They filter chemical pollutants from air, fix carbon and produce oxygen. They reduce surface water runoff, allowing water to filter through soil or be returned to the atmosphere. These benefits are especially needed near high pollution areas such as roadways. Trees also moderate temperature, providing shade in summer to cool the ground, and provide wildlife habitat. Mitigation from these losses should be provided if the project proceeds.

Response: BPA is aware of the public benefits that trees provide, and the difficulty proposed transmission projects face balancing conflicting public benefits. This proposed project would provide an adequate power supply, also a public benefit, through a reliable delivery system to meet Tanner's present power needs and Tanner and Puget's future power needs in the North Bend area. BPA proposes to provide vegetation in certain areas where trees would need to be removed. See Comments 3.5-5 and 3.5-7.

Comment 3.5-9: Present and future implications of right-of-way on existing 150-foot wide right-of-way plus new right-of-way and the loss of vegetation, including danger trees, is the main concern.

Response: BPA is locating the line partially on the existing 45-m (150-foot) wide right-of-way, along the existing private roads, and within the city, county and state rights-of way so as to minimize the amount of clearing that would be necessary to construct, operate and maintain the line, including danger trees.

Comment 3.5-10: *EA wasn't clear about compensation for danger trees.*

Response: Where BPA would only acquire danger trees, we would only be acquiring a one-time cutting right. These trees would then belong to BPA to sell, give to the contractor, or give to the landowner, whatever BPA decides to do. BPA would pay fair market price (stumpage value, as recognized by the industry) to the landowner for any merchantable trees removed. On properties where BPA would be acquiring easement rights, compensation for nonmerchantable, tall-growing vegetation that would need to be cut would be included in the land value.

Comment 3.5-11: Replant area between North Bend Way and Alm Way with 2-inch caliper trees.

Response: BPA would revegetate this area with vegetation that would not interfere with the safe operation of the transmission line in this location, should the transmission line be constructed. BPA would consult with Puget's publication on selecting the right species that would be compatible with transmission lines, and also consult with the City of North Bend, the City of Snoqualmie and the Snoqualmie

Valley Railroad on the acceptability of the species, location and size of the vegetation to be planted, prior to installing any vegetation in this area.

Comment 3.5-12: Consider water truck for plant survival first few years after planting. Possible City of North Bend could volunteer water truck (Tanner truck, city water?).

Response: BPA appreciates the suggestion. Maintenance of any vegetation planted in the project areas would be the responsibility of the contractor until such vegetation would become established, normally one year.

Comment 3.5-13: Wants logs on ground moved up to the house so they can use them.

Response: BPA would consider complying with this request, should the project be implemented.

Comment 3.5-14: We can mark trees on the east side of SE 356th Avenue.

Response: BPA appreciates the cooperation of the landowner.

Comment 3.5-15: *Wants vegetation planted back in easement area.*

Response: BPA would reseed all disturbed areas following the cessation of construction activities. The purpose of the reseeding effort would be to prevent erosion and the proliferation of noxious weeds, help prevent the establishment of tall-growing vegetation within the right-of-way, and reduce visual impacts associated with earth moving activities.

Comment 3.5-16: *Gave permission to mark trees east of the road.*

Response: BPA appreciates the cooperation of the landowner in being able to identify what trees would likely need to be taken if the project is implemented.

Comment 3. 5-17: Landowner doesn't want hemlock removed; however, doesn't object to removal of cottonwoods.

Response: BPA would try to save the hemlock if it would be outside of the proposed right-of-way, and would not be perceived to be a threat to the safe and continued operation of the line. If not, it would need to be removed as a "danger tree." See also Comment 3.5-5.

Comment 3.5-18: Landowner wants certain trees topped rather than felled. Understand the hemlocks growing out of stumps will need to be cut.

Response: BPA has limited resources to keep tall-growing vegetation out of the 24,000 km (15,000 circuit miles) of transmission lines that it owns. The decreasing budget does not provide enough resources to top or to trim trees instead of removing them associated with BPA rights-of-way. BPA does, however, allow landowners to keep their tall-growing vegetation out of BPA power lines, if the landowner would assume full responsibility for any disruption to service should an outage or fire result from a flashover caused by vegetation being in violation of the minimum clearances identified.

Comment 3.5-19: Landowner concerned that they and neighbors fought so hard to get the buffer and that we will be taking part of it out.

Response: Please see Comment 3.8.2.

Comment 3.5-20: After we take out the trees, they will be able to see buildings on Quadrant property. They don't think the Business Park is a good neighbor because of the noise from back-up beepers, other noises and light.

Response: Please see Comments 3.8-2 and 3.8-3.

Comment 3.5-21: *Landowner would never want to see a tree cut.*

Response: Comment noted. Please see Comment 3.5-5.

Comment 3.5-22: Section 3.5.4 states that mitigation actions specify that "the disturbed areas (would be revegetated) with low-growing vegetation to guard against noxious weeds, prevent erosion, and to preserve visual quality." Instead of using the term "low-growing," mitigation standard should stipulate replacement vegetation to the maximum height feasible in relation to the power structures and maintenance road. That would be real screening and real mitigation.

Response: Comment noted. BPA has adopted a policy of encouraging the growth of low-growing vegetation on its rights-of-way to keep tall-growing vegetation out of the conductors. This policy has been adopted so as to maximize the use of limited resources and to preserve the environment to the maximum extent possible. BPA has a limited budget to keep vegetation out of 15,000 circuit miles of transmission lines

under its control. And the fewer times BPA needs to clear vegetation from its rights-of-way, the less intrusion on the environment.

With respect to the recommended change, please see the third mitigation measure in Section 3.8.4 (Visual Section) which states that "a plant specialist would assist with identifying the appropriate plant species to reduce the visual impacts to the residents, Snoqualmie Valley Railroad passengers, and I-90 travelers resulting from removal of tall growing vegetation. BPA would consult with the Greenway Trust before undertaking any plantings within the I-90 right-of-way."

WETLANDS/FLOODPLAINS (CHAPTER 3)

Comment 3.6-1: *D Creek has a legally mandated buffer. What are we going to do about that?*

Response: D Creek is considered a Class 2 Stream in the City of Snoqualmie and in unincorporated King County. Local regulations have established a 50-foot buffer adjacent to this intermittent stream. Since sensitive areas are difficult to avoid with linear facilities, such as transmission lines, BPA would minimize, to the maximum extent possible, any impacts to wetlands, including D Creek, and adjacent buffer areas.

BPA would span both the wetland and buffer area in this location, and would minimize any clearing that would take place in the wetland and buffer area. Any vegetation that would need to be removed would be left in the sensitive area as wildlife habitat. Should any access roads be constructed in wetlands at this location or elsewhere associated with this proposed project, BPA would acquire the necessary permits though the appropriate permitting agency, which in this case would be the Army Corps of Engineers. In addition, BPA would require that the contractor prepare a sensitive area site plan prior to initiating any construction activities in sensitive areas, including wetland buffer areas.

Comment 3.6-2: Wetland/streams. The proposed route will cross several wetland and stream areas requiring clearing and tree removal within the sensitive area and/or buffer. The EA does not discuss the amount of clearing proposed within these sensitive areas, nor proposed mitigation to replace the functional loss of tree and vegetation cover within stream and wetland areas.

Response: Tree removal within stream and wetland areas would have minimal impact on the value and functions provided by these aquatic resources. Since the proposed transmission line would cross waters at nearly right angles and would be adjacent to existing right-of-way over most of the route, clearing would be kept to a minimum and would not fragment existing vegetation cover types. Only trees, which

pose a hazard to the proposed power line construction, operation, and maintenance would be removed. In most cases, low-growing streamside and wetland vegetation and shade-providing shrubs would not be removed. Disturbed areas would be restored and revegetated following construction activities with suitable vegetation. In addition, since the quantity of trees that would be removed at stream and wetland crossings is minimal, the proposed project is not expected to have a detrimental effect on water temperatures. Although impacts are expected to be minimal, any mitigation of adverse impacts would be conducted in accordance with conditions determined appropriate with the jurisdictional agencies involved.

Comment 3.6-3: What does BPA do about wetlands?

Response: BPA's first priority is avoidance, i.e., locating transmission facilities on uplands. Where wetlands could not be avoided, BPA attempts to span them where practical (minimization). If they could not be spanned, any disturbances to these sensitive areas would be mitigated (e.g., installing soil liners and replacing topsoil removed during construction activities, etc.). Specific mitigation would be identified by the permitting authority, the Army Corps of Engineers.

Comment 3.6-4: 100-foot buffer on either side of stream where possible. (Alm Way-North Bend Way).

Response: The City of North Bend has established a 30-m (100-foot) buffer on either side of Gardiner Creek within the City of North Bend. Due to the channel of the creek between North Bend Way and Alm Way, BPA would not be able to site the wood poles outside of the 30-m (100-foot) buffet area. Any vegetation removed from the buffer area would be left as wildlife habitat.

Comment 3.6-5: *Mitigation in North Bend. Mostly evergreen and low-growing varieties, such as huckleberry, salal, etc.*

Response: BPA will leave snags where practical, and replant the area between the railroad and Gardiner Creek with low-growing evergreen varieties and other species such as huckleberries and salal as needed. See also Comment 3.5-11.

Comment 3.6-6: *Minimize cutting vegetation around sensitive areas such as streams, wetlands, etc.*

Response: BPA would minimize the clearing that would be necessary for the entire project. Particular care would be taken for sensitive areas, such as within wetlands or wetland buffer areas. And any vegetation removed from wetlands and wetland buffer areas would be left as wildlife habitat.

FISH AND WILDLIFE (CHAPTER 3)

Comment 3.7-1: The upper Snoqualmie Valley has been included in the mapped area for bull trout listing by the USFWS. The City of North Bend is presently waiting for survey work to be conducted to confirm or deny the presence of the bull trout in the river and streams in the City, including Gardiner Creek.

Response: BPA obtained information from the Washington Department of Fish and Wildlife (WDFW) that they have no information indicating that bull trout were ever above Snoqualmie Falls. Curt Kraemer, Supervisor of the WDFW's Mill Creek office told us on February 18, 2000, that there have been several recent habitat projects that have conducted monitoring studies using electro fishing techniques on the Southfork Snoqualmie River that found no bull trout. They are aware of continued plans for additional surveys by King County and others beginning this year (2000).

With regard to the results of any new surveys brought to the City of North Bend's attention, BPA would appreciate hearing from the City of North Bend if any bull trout were found.

Comment 3.7-2: Whether or not the claim that no endangered species are present is valid depends on how thorough surveys were from which this conclusion was drawn. I would like to have more information on this subject before commenting.

Response: With respect to rare and endangered species investigation regarding fish, wildlife and plants, BPA obtained the information used to draw its conclusion of "no affect," from the Washington Department of Fish and Wildlife data bases for listed plants, fish and wildlife, and the U.S. Fish and Wildlife Service with respect to critical habitat of the Northern spotted owl and marbled murrelet. See also response to Comment 3.7-1.

Comment 3.7-3: Saw a black bear on the road two nights ago. This area has been a haven for the people and wildlife. Now the animals are confused because of all the development.

Response: Wildlife habitat for bears and other wildlife in the proposed project area is undoubtedly affected by past and present development. However, Section 3.7.3 of the EA analyzed the cumulative impacts on the fish and wildlife resources in the project areas (including bear), and found that although habitat would be modified, the amount of habitat removed or converted would be too small to noticeably contribute to the local reductions of fish and wildlife populations within the project area.

VISUAL QUALITY (CHAPTER 3)

Comment 3.8-1: *Concerned about visual impacts.*

Response: BPA is also concerned about the visual impacts of the proposed transmission line and related substation. To mitigate the visual impacts of the proposed line, BPA would be: (a) using darkened wood poles and nonspecular conductors; (b) adopting a relatively narrow 15 m (50-foot) wide right-of-way; (c) modifying the existing "danger tree policy" to take as few as possible; (d) and using a portion of an existing BPA right-of-way and adopting a one-utility planning principle of designing the transmission line to accommodate multiple utilities using BPA poles. In addition, BPA would be reseeding all disturbed areas immediately after construction, as well as providing low-growing and tall-growing vegetation, where needed.

Tanner Electric would also provide a landscaped berm around the north and east sides of its proposed substation in the City of North Bend.

Comment 3.8-2 The EA is inadequate because it fails to address issues important to the residents of the area near SE 356th Avenue, which is the clearing issue. It is incomplete in that it does not adequately address the impacts of clearing along S.E. 356th Avenue that exposes the Snoqualmie Business Park to the residents east of the development. In addition, the EA does not discuss the three policies within the Comprehensive Plan that are violated i.e., Policy 2.B.1 "protect natural features and processes and generally sustain a high quality natural environment," Policy 2.B.4 "provide physical and or visual buffers such as open spaces which help separate incompatible uses...," and Policy 2.B.8 Promote the planting of trees on public and private land..."

Response: In response to this comment, BPA has revisited the environmental consequences section of the Preliminary EA, and has added an additional mitigation measure to help mitigate the impacts clearing would have on the residents in this area. BPA would work with the landowner of the Business Park, the Quadrant Corporation, and the City of Snoqualmie in adding additional vegetation within the buffer strip that was intended to separate the Business Park from the adjacent residential properties.

Comment 3.8-3: The City of Snoqualmie is concerned that removal of danger trees in the 50-foot wide perimeter buffer along the east boundary of the Snoqualmie Ridge Business Park could significantly degrade the buffering function provided by existing large trees and diminish the experience of trail users. At a minimum, BPA should commit to planting trees and shrubs in the Snoqualmie Ridge Business Park buffer

and consider locating the new line within the eastern portion of the existing right-ofway where removal of danger trees would not impact the ongoing function of the required buffer and public open space area.

Response: For construction, BPA would only be removing a limited number of "danger trees" within the existing 50-foot wide buffer, according to BPA's forester, Kathy Stephenson. However, additional trees may be removed if it is found that they would also threaten the security of the line in the future. Though removing these danger trees (likely hemlock) would not significantly degrade the buffering provided by the existing trees nor diminish the experience of trail users, removing these trees plus the clearing that would be required for the proposed right-of-way would contribute to the visual impacts of those property owners located near the business park. BPA would work with the landowner, Quadrant Corporation and the City of Snoqualmie, in adding additional vegetation to the buffer area to mitigate this impact.

With respect to consideration of locating the proposed transmission line on the east side of the existing BPA 45-m (150-foot) wide right-of-way, BPA had early in the process decided not to locate the line on the eastside of the existing BPA right-of-way to minimize the land use impacts to the residents who reside near the line.

Comment 3.8-4: Here is the sticking point for us, way back when hearings were underway on the Snoqualmie Ridge development and the business park directly west of us, the City of Snoqualmie ordered the fifty foot buffer to protect residents such as (us) from the effects (primarily visual) of the development. Had any of us known at the time that you were going to take (or attempt to take) the piece of property we have west of the road, as well as part of the buffer, we would have asked for, and the City probably would have granted, a wider buffer. The City would have granted a wider buffer or not allowed the horse trail to be a part of the buffer. And the City's intentions are not fulfilled because we are no longer protected.... Or maybe you think I am an overly sensitive viewer (page 28 of the EA). As you know, residents were so concerned about something like this happening, that we convinced a hearing examiner to ban BPA power lines from the buffer. The intent of this order is not fulfilled if you cut down danger trees in that buffer.

Response: As a result of the need to remove danger trees from the buffer, some tall-growing vegetation (danger trees) may need to be removed from the buffer on an ongoing basis. To mitigate this impact, BPA would work with the Quadrant Corporation to add additional vegetation to the buffer area. This additional mitigation measure has been added to the Final EA, Section 3.8.4. See also Comments 3.8-2 and 3.8-3.

Comment 3.8-5: The EA speaks to the visual impact of new poles on our road, but it does not speak at all to the impact on us of the damage to our buffer. For us this is THE issue. In fact, I will make a deal with you. You can put up five poles...no ten

poles on our property to the west of 356th, but you do not cut down a single tree to do it. Deal?

Response: BPA regrets the need to remove any trees on its rights-of-way or proposed rights-of-way, but understands that it must do so to ensure a safe and reliable power supply to its customers. BPA has a limited budget for right-of-way maintenance to keep tall-growing vegetation out of its power lines. By encouraging the growth of low-growing species and discouraging the growth of tall-growing species, BPA minimizes costs and environmental impacts associated with the need to revisit these areas. Also, please see the response to Comment 3.8-4.

Comment 3.8-6: Location of the proposed transmission line on or adjacent to Greenway Trust lands is reportedly incompatible with their mission, i.e., transmission lines are not considered scenic. We also do not consider the (power) lines to be a compatible neighbor to our property because of the loss of trees and other native vegetation that currently provide many benefits noted above, as well as the buffer between us and the freeway on ramp. We don't want to see it, hear it or breathe the fumes of the vehicles; their drivers don't want to see us. Locating the line somewhere else (or not at all) would serve both the Greenway Trust goals as well as our own. Arguing that putting the line on the north side of the freeway is compatible with the Trust, while the south side is not is inconsistent in both cases, the line would be visible to drivers.

Response: The Preliminary EA (page 7) stated that one of the reasons against siting the line on the south side of I-90 was that the alignment would cross an undeveloped parcel that was in the process of being transferred to the Land for Public Trust (Greenway Trust), and that a transmission line would be at odds with protecting the parcel from development in perpetuity. The Greenway Trust is a non-profit organization, initiated by citizens, to create and permanently protect this multipurpose green corridor while accommodating growth and change. The organization is not anti-growth, only that it be accomplished in an environmentally acceptable manner within the 90-mile I-90 corridor.

BPA rejected locating the line south of the I-90 right-of-way due to a number of additional reasons besides impacting the parcel that would be acquired by the Greenway Trust. These included: crossing the freeway twice where no crossing would be necessary; crossing both the highway and the North Bend Way on-ramp, together with the relatively flat topography in this area, would require unusually tall structures to cross over these arterial roads; and the need to purchase additional land and construct a longer transmission line would increase both the construction costs for labor and materials and electrical line losses.

Comment 3.8-7 *Loss of vegetation between them and the freeway will cause increased noise and lights from the freeway.*

Response: The environmental noise analysis undertaken as a part of the environmental review indicated that no perceptible increase in noise would result from removal of the existing vegetation (for right-of-way and danger trees) to construct, operate and maintain the proposed transmission line (see Appendix B, Environmental Noise Analysis).

With respect to the concern that right-of-way clearing between the residents and the west bound travel lane of I-90 would cause vehicle headlamps to adversely affect these properties, this should not occur. While some vehicles, especially large trucks are occasionally visible, especially during the winter months and at night, visible light from headlamps should not increase markedly because the direction of the headlamps would be at a right angle to the viewer as these vehicles traveled westbound. The headlamps would be directed towards the flow of traffic, not onto the residential properties that lie adjacent to the freeway.

Comment 3.8-8: The buffer is the issue. There aren't very many trees, and we want to keep the few there are.

Response: Comment noted. See Comments 3.8-1 and 3.8-2.

Comment 3.8-9: *Mentioned the planting of shrubs and small trees in the right-of-way and replacing what gets cut from the buffer.*

Response: Please see Comments 3.5-2, 3.8-1 and 3.8-2.

Comment 3.8-10: Right now, between their house and the existing swamp is the buffer. When we take the buffer they will be looking at the new police station, the lights, and the building on Quadrant property.

Response: Comment noted. Please see Comments 3.8-1 and 3.8-2.

Comment 3.8-11: The North Bend Way right-of-way between Exit 27 to Kimball Creek serves as one of the primary entrances to the City of Snoqualmie (in addition to the City of North Bend). Element 8 of the Snoqualmie Vicinity Comprehensive Plan addresses requirements for development/annexation of land within this portion of the City's urban growth area. Policies 8C.1.4 and 8C.2.4 require consideration of the scenic resources of these planning areas and the function they serve as an aesthetic backdrop and gateway of the City, and provides measures to protect scenic views. The existing character of this gateway corridor is established primarily by the undeveloped nature of the corridor, particularly with respect to the large evergreen trees adjacent the roadway. Clearing of a 50-foot swath adjacent to the roadway

would significantly alter the appearance and feel of this important gateway to the city (Snoqualmie). Removal of additional danger trees would have further negative impacts on this gateway to the historic portion of Snoqualmie and Rattlesnake Ridge open space.

Response: BPA is proposing to site the proposed transmission line within the North Bend Way right-of-way between the I-90 right-of-way and SE Meadowbrook Way on the north side of the public right-of-way. BPA has selected the north side of North Bend Way to site the line so as to: (1) minimize the clearing that would be necessary to construct the line (clearing would be minimized since an existing distribution line and its associated clearing is already located on the north side of this right-of-way, in addition to the clearing that has already been undertaken for the roadway itself); (2) avoid the siting of an additional utility line on the south side of North Bend Way, when a utility line already exists on the north side of North Bend Way, and would likely remain there (see discussion under Section 2.3.1, Alternative Route Segments (Segment E, South side of North Bend Way Alternative); and (3) to conform to the King County Comprehensive Plan (Chapter 12 of the Energy and Telecommunications Section [ET-203]), which states that when new, expanded or upgraded transmission is required, use of existing corridors that have above-ground utilities should be evaluated first, and that King County should facilitate appropriate corridor sharing among different utility types and owners. BPA is designing the proposed facility to accommodate Puget's underbuild.

In addition, to protect the scenic qualities of North Bend Way to the best of our ability, BPA would be using a relatively narrow right-of-way (15 m [50 feet] wide), and would be limiting the number of danger trees that would need to be removed to the maximum extent possible. See also Comment 3.5-5.

Comment 3.8-12. City of North Bend. This is an area of high visual sensitivity. The City has taken active steps to protect the north side of North Bend Way from Alm Way east to Gardiner Creek and preserve the visual gateway into the City by acquiring the property as part of the Meadowbrook Farm open space area. The section of new transmission line running from east Alm Way to the proposed substation would require removal of many significant trees (per NBMC 18.18.040(M)) directly south of the City's Meadowbrook Farm property along North Bend Way. The City requests that the trees removed along the new section of transmission line running along North Bend Way from Alm Way east to the new substation be mitigated by replanting with compatible shrubs and low-growing trees that would re-establish the forested character of this visual gateway to North Bend. The City's request is consistent with the recommendation outlined on page 4 of the Cultural Resource Assessment found in Appendix A in the Preliminary EA.

Response: BPA would mitigate the loss of vegetation in this area with low-growing vegetation compatible with transmission line rights-of-way. BPA would work with

the City of North Bend and the Snoqualmie Valley Railroad in identifying appropriate plant species that would be used as mitigation.

Comment 3.8-13: Visual Quality. A potential visual quality loss is acknowledged for S.E. 96th Way residents, but no mitigation is offered.

Response: BPA has undertaken an environmental assessment on the proposed action to identify the impacts that would be created by the proposed action, and to determine their significance. BPA is not required to mitigate all impacts from a proposed action, only those that would reduce a significant impact or a potentially significant impact below the level of significance. Although the residents and guests of those who use 96th Way would experience an open canopy where, prior to the proposed development, a closed canopy over the private road was in place, this impact cannot be mitigated since tall-growing vegetation is not compatible with transmission lines. BPA would leave the salmonberry along the bank of the Thompson parcel. Since no significant or potentially significant impacts would be created by the limited amount of clearing that would be undertaken in this area, no mitigation would be required beyond that which would be paid to the affected landowners. See also Comment 3.3-4.

Comment 3.8-14: You say you're going to remove 1/2 the tree cover, yet you say we're not going to notice the transmission line?

Response: Residents and guests traveling on SE 96th Way, a private road, would notice the transmission line on the Thompson property, along the south side of SE 96th Way. Trees border much of the road at the present time. The trees on the south side of the road would be removed to allow the line to be built and operated and maintained in a safe and reliable manner. Those travelling on SE 96th Way would lose the closed canopy that presently exists over the roadway over most of its length between the turnaround and the I-90 right-of-way. See also Comments 3.8-13 and 3.3-4.

Comment: 3.8-15: Leaving pavement on 96th Street onto 96th Way (Gordon driveway) main concern is trees removed on Thompson's property. Road is now tree covered and clearing will remove the aesthetic canopy over the road.

Response: The clearing would remove the closed canopy over the road. See also Comments 3.8-13 and 3.8-14.

Comment 3.8-16: Concerned that you do everything possible to mitigate cutting of trees along North Bend Way and Alm Way - replanting with compatible species to reforest route, since it's a gateway into the City of North Bend, and a scenic route.

Response: BPA would prepare a planting plan and review it with the City of North Bend and the Snoqualmie Valley Railroad prior to undertaking mitigation in this area.

Comment 3.8-17: Puget Power has a good guide for compatible plant species with regard to transmission line rights-of-way.

Response: BPA appreciates the suggestion. We have requested a copy of the brochures from the utility, and they have sent us the information. We would use the information in developing project mitigation. Thank you.

Comment 3.8-18: Outside of the 50-foot right-of-way (or its equivalent) where danger trees would be removed, mitigate with trees compatible with the transmission line. Within the 50-foot right-of-way, use shrubs greater than 10 feet tall for mitigation (near Alm Way and North Bend Way).

Response: Comment noted. As a matter of policy BPA encourages the growth of low-growing plant varieties within BPA rights-of-way, and discourages the growth of tall-growing varieties. BPA does not allow vegetation taller than 3 m (10 feet) to grow in the right-of-way.

Comment 3.8-19: You went to great expense to prepare visuals (photo simulations) along highway corridor, but did not prepare any simulations for SE 356th showing the right-of-way corridor there.

Response: In response to this comment, BPA has prepared additional photo simulations for the project, specifically photo simulations for the proposed right-of-way in the vicinity of S. E. 356th Avenue. Please see Photo Pairs 1 and 2 within the Final EA.

Comment 3.8-20 *How will you protect the buffer?*

Response: BPA proposes to remove as few danger trees from the buffer as possible. See Comments 3.8-1 and 3.8-2.

Comment 3.8-21: We need a map or visual aid that shows the details of the visual impacts of the 50-foot swath of clearing on the I-90 right-of-way.

Response: BPA has prepared photo simulations showing the proposed transmission line within the I-90 right-of-way (please see Photo Pairs 5 and 6). Prior to installing any vegetation in the I-90 right-of-way, BPA would prepare a planting plan that

would identify the species, number, size and location of trees and low growing shrubs that would be planted on the state right-of-way. BPA would also work with the Greenway Trust and the Washington Department of Transportation in preparing such a plan. BPA would attempt to reach concurrence with this agency and organization before planting any vegetation within the state right-of-way.

Comment 3.8-22: We also need to specify the type of vegetation we plan to use along The I-90 corridor, i.e., what species of evergreens, etc.?

BPA would work with the Greenway Trust and the Washington State Department of Transportation in identifying the species and location of the low-growing and tall-growing vegetation that would be planted in the I-90 right-of-way, as mitigation for project impacts within the State right-of-way. See also the response to Comment 3.8-21.

Comment 3.8-23: The hearings for Snoqualmie Ridge were timed badly. If they had known during the process for acquiring the buffer that BPA would be acquiring, they would have asked the City for more width in the buffer. The landowners thought that, when Puget dropped the project, it had gone away. The City was good to them and worked with them for the buffer.

Response: Comment noted. See also Comments 3.8-1 and 3.8-2.

Comment 3.8-24: I believe a full assessment of the visual impacts would stipulate that one of the most negative impacts in a forested corridor is the linear swath of cleared zone required for safe erection of the power line. And that these cleared paths are noticeable along the scenic highway because they head straight cross a landscape without regard to natural contours or land forms. To people travelling this National Scenic Byway to enjoy the natural scenery, they are a painful intrusion.

The commentor goes on to say that we should more fully describe the disruption to a scenic environment caused by these unnatural linear cleared paths and then to discuss methods for mitigating the "line across the landscape." In previous discussion (with BPA), we have talked about varying the path of the line as it crosses undeveloped land. Upon walking the proposed route with BPA staff, we were given verbal commitments to make several deviations from a straight line in the alignment of the power corridor, and would like to see that practice spelled out as mitigation and documented in a detailed map of the site, (within the I-90 right-of-way).

Response: BPA recognizes that one of the most negative impacts in a forested area is a cleared right-of-way that runs perpendicular to the slope of the contour or an access road which travels along ridge lines. Usually these visual scars are very noticeable at higher elevations (from the viewer) and at great distances. This is not

the situation with the proposed project. The proposed right-of-way would run parallel to the motorist on I-90, and would be mostly screened from public view behind an existing row of trees that would remain (see photo simulations of proposed line within the I-90 right-of-way). Furthermore, the proposed transmission line would have four angle points within the I-90 right-of-way varying from three to seven degrees, i.e., four of the eight wood poles structures would be angle point structures. Additionally, BPA would seed the proposed access road following the completion of construction activities, and develop a planting plan to further mitigate the visual effects of the transmission line and right-of-way. BPA would work with the Greenway Trust in developing the planting plan, and plant the vegetation soon after the completion of construction activities.

Comment 3.8-25: During a tour of the site, BPA committed to have its forester carefully analyze large trees in the danger zone to maximize retention of every tree possible. The Greenway Trust understands that unless a tree was clearly a danger due to disease, age or specie it would be preserved. We hope this is the standard you are using and would like to see that stipulated explicitly in Section 3.5.4, where you say clearing would be minimized.

Response: The Greenway Trust understanding is correct, BPA would make every effort to save the maximum number of trees adjacent to the right-of-way within the I-90 right-of-way. BPA is taking all cottonwoods, alder and hemlock that could hit the line as well as Douglas fir trees that are infected with root rot. Other species adjacent to the right-of-way would be side-trimmed, if possible. If not possible, they would need to be taken.

Comment 3.8-26: Regarding selections of plants to screen and revegetate the power line right-of-way, we would like to see specific recommendations for a preponderance of evergreen plant materials, particularly small trees. While some conifers may not be native to the site, it is more important that they give year-round screening for both the view from the highway as well as from the adjacent property owners who would be most affected when existing large trees are removed at the edge of their property. Furthermore, the goal of the mitigation should be to completely screen the 50-foot wide right-of-way from I-90 and surrounding properties.

Response: Comment noted. BPA would work with the Greenway Trust in preparing the planting plan for the I-90 right-of-way at this location. BPA would seek the advice and concurrence of the Greenway Trust in the species selected, location and size of woody vegetation and low-growing brush that would be used to mitigate these impacts within the I-90 right-of-way.

Comment 3.9-1: The cumulative socioeconomic and environmental impacts of bringing more power to North Bend are not beneficial. To the extent that the power source for the additional power is hydroelectric, greater pressure to preserve dams that negatively impact endangered anadromous fish would result. Enabling further development of North Bend would contribute in the decline in the value of our local environmental resources, with increased loss of forest and all the losses that go with it. Redevelopment will also put more traffic on our roadways, creating more noise pollution, laying down more cadmium and zinc and other solid pollutants (heavy metals) to wash into our waterways. Producing more ozone, carbon monoxide, carbon dioxide (more global warming) and other air pollutants. The larger population will bring more crime to the area as well.

Response: The environmental impacts of the redevelopment of the City of North Bend is outside the scope of this environmental document, as is the impact of dams on endangered fish runs. With respect to the increase in crime that normally follows an increase in population levels, increased traffic and the resulting increase in pollutants, such as heavy metals that would be deposited on roadways and affect air quality, these secondary affects are also outside of the scope of this environmental review. With regard to the loss of forests and of the forest habitat, please see Comment 3.5-1.

Comment 3.9-2: Higher taxes will be needed to build schools and infrastructure to support the larger population. If this is progress, it is progress toward a lower quality of life for most species currently in the area.

Response: The need for additional schools and infrastructure improvements is outside of the scope of this environmental review.

Comment 3.9-3: Concern for value of easement rights. Current value will not be equitable in a few years.

Response: When BPA acquires land rights for utility facilities, it does so by purchasing the rights from the underlying landowner(s). Should the landowners ever sell or otherwise transfer ownership of a property affected by utility facilities, the compensation sought would reflect any such restrictions that would run with the land. The presence of any encumbrances on private land, such as easements, are normally identified through the title search process that normally precedes changes in title.

Comment 3.9-4: Aware of an offer from a cell phone company of \$6,000 for two trees near their property.

Response: Comment noted. BPA pays fair market value, as recognized by the industry, for timber needed to be removed from private land and the state right-of-way. King County is waiving its right to compensation for the timber and has requested instead that any timber removed from North Bend Way right-of-way in unincorporated King County be offered to the adjacent landowners at no cost.

Comment 3.9-5: Moved here for investment opportunity because of Snoqualmie Ridge. Property has almost doubled in value since 1996.

Response: Comment noted.

Comment 3.9-6: Bought property seven years ago as an investment.

Response: Comment noted.

Comment 3.9-7: The assessed value of their property is \$463,000 and all of the development in the area is driving them out because of increased property taxes. In 1994, they paid \$350,000. Their taxes have increased over twenty percent per year. When they asked for the King County Assessor's explanation of how they arrived at their assessed value, it was not explained to their satisfaction

Response: Comment noted. Any past increase in real estate taxes within the project area is outside the scope of this environmental review.

Comment 3.9-8: There are no comparables for a log home that has a business park, golf course, and hundreds of new homes surrounding them.

Response: Comment noted. The BPA appraiser has analyzed the market in the project area and has determined that there is sufficient market evidence to use the market approach to establish the fair market value for all land rights needed.

Comment 3.9-9: There is only one thing more important to them than their home, i.e., their children.

Response: Comment noted.

Comment 3.9-10: Comparable analysis is in the eye of the beholder. They have a log home and it has a unique real estate market.

Response: BPA acknowledges that log homes are in a unique real estate market. The costs to construct log homes typically exceed the costs of constructing traditional stick frame homes. See also response to Comment 3.9-8.

Comment 3.9-11: The existing buffer is a positive amenity, and it should be valued differently than across-the-fence values.

Response: Comment noted.

Comment 3.9-12: Socioeconomics: The EA estimates a "short-term (0-2 percent) reduction in property value." This EA estimate is not valid for the proposed situation and likely underestimates the loss in property value.

Response: The statement in the Preliminary EA on page 34, "The residential sales did, however, identify a small but negative impact from 0-2 percent for those properties adjacent to the transmission lines as opposed to those where no transmission lines were present," does not refer to short-term impacts. The EA goes on to explain that "some short-term adverse impacts on property values (and salability) might occur on an individual basis; however, these impacts would by highly variable, individualized, and unpredictable."

Comment 3.9-13: I requested a copy of the reports from which BPA reached this conclusion, but have not received it. Per conversation with BPA representatives at the June 5 Open House, the housing studied did not include comparable conditions to the proposed Tanner power line location, i.e., location in an otherwise forested buffer between the property or housing and busy roads or highways. Since many people consider the presence of power lines to be undesirable, and prefer more forested buffer between their homes or property and a busy, noisy road/highway, rather than less, the pool of potential buyers for an affected home is reduced. This corresponds, at least, to a longer average time to sell if not also a lower value. The longer time represents an economic loss, a real reduction in value

Response: A copy of the International Right-of-way, September/October 1996 article entitled, "Transmission Line Impact on Residential Property Values" published by Cowger, et al. has been sent. The update to this study, which found similar results to the 1996 article, is not currently available, as it has only recently been submitted for publishing. As soon as it is published, likely in the next few months, we expect to receive permission from the publisher to release copies. We will forward a copy of this study to the commentor at that time.

You are correct that the BPA study of residential properties impacted by transmission lines may not be directly comparable to the conditions along the proposed transmission line. However, the study did include a diverse collection of properties ranging from tract homes in a subdivision to homes on acreage. BPA uses studies like this to provide an indication of long-term impacts of transmission lines on residential property values. At the time the Preliminary EA was written, BPA did not have the advantage of having completed appraisals of the specific properties impacted by the proposed transmission line. If a decision is made to construct the transmission line, we will use maps and legal descriptions of the impacted properties and complete appraisals for the specific properties. BPA's appraiser will use market data specific to the immediate area in determining the fair market value of the land rights needed and the impact of the proposed transmission line on the affected properties. In regard to the visual impacts to the forested buffer, please see responses to comments under 3.5.

BPA's studies considered how much longer properties with transmission lines remained on the market as compared to similar properties unaffected by transmission lines. Properties with transmission lines cited in the 1996 study were on the market an average of 8 days longer than the unaffected properties. In the Seattle area, the article indicated that the properties were on the market an average of 3 days longer than unaffected properties.

Comment 3.9-14: *Property values are diminished by the presence of powerlines.*

Response: Construction of the proposed transmission line is not expected to cause long-term adverse effects to property values along the right-of-way or in the general project vicinity.

Comment: 3.9-15: *Compared their area with upland estates.*

Response: Comment noted.

CULTURAL RESOURCES (CHAPTER 3)

(No comments received)

Comment 3.11-1: Due to the uncertainty of electromagnetic field (EMF) concerns, the commentor would like BPA to drop the split alternative from further consideration.

Response: We recognize the commentor's concerns and can offer no conclusion regarding health effects of EMF except to say that the evidence for risk of cancer and other health effects from EMF exposure has been weak and the probability that EMF exposure is a health hazard is small. Most of the scientific information doesn't establish that exposure to EMF fields at levels normally encountered in our living environments might cause adverse health effects, and the National Institute of Health Sciences (NIEHS) recently concluded (6/99) that the findings of their studies are insufficient to warrant aggressive regulatory action. For more information on EMF we suggest the reader access the following web site: http://www.niehs.nih.gov/emfrapid/home.htm

The comment referenced an extensive collection of information gathered from an Internet site entitled "Powerlinefacts.com." The power line task force, whose sole objective is to prevent the construction of a 115-kV transmission line in Minnesota, created this web site which helps support their case.

It is important to note that the Minnesota case differs from the proposed scenario in that the Minnesota line would be heavily loaded and there are numerous homes located 6-7.5 m (20-25 feet) from the proposed transmission line. Because of the proximity to homes, and high loading of the line, the Minnesota transmission line would result in EMF exposures of 50 mG (milligause) at the edge of the right-of-way under peak load conditions. The proposed BPA line would be lightly loaded, and EMF levels would not exceed 3.5 mG at the southern edge of the right-of-way along Alm Way. The EMF levels would be significantly lower 46 m (150 feet) from the line; approximately 0.1 mG under peak load conditions (see Figure 13). Under normal conditions, EMF would even be lower, about half peak levels.

The proposed transmission line would have a minor contribution to EMF exposures in the homes along Alm Way because EMF drops off exponentially with distance, i.e., fairly rapidly. EMF from the proposed BPA line would be far less that what most people normally encounter in their homes (reference Zaffenella, 1993) where wiring configurations and household appliances dominate exposures, e.g., hair dryers (300 mg), electric blenders (70 mG), electric mixers (100 mG), vacuum cleaners (300 mG) and microwave ovens (200 mG). These are average EMF values measured six inches from the units (source: EMF in Your Environment, EPA, 1992). Normal background levels in a typical home where these electrical household appliances are commonly found are 0.5 mG (Source: Electric Powerlines, Questions and Answers on Research into Health Effects," DOE/BPA -2081, 11/93).

Prior to adopting the so-called "Split Alternative," BPA had considered siting the proposed transmission line entirely down Alm Way, but subsequently moved the proposed alignment to continue down North Bend Way after crossing the railroad right-of-way for 245 m (800 feet) before moving over to Alm Way to avoid siting the line close to the Alm Way residents.

NOISE AND RADIO/TV INTERFERENCE (CHAPTER 3)

Comment 3.12-1: *Concerned about increased noise (with the project).*

Response: There should be no noticeable increase in environmental noise as a result of the proposed action. Transmission lines of this voltage (115,000 volts) produce no audible noise; however, the proposed transformer at Tanner's proposed substation would produce an audible noise (hum). The noise emitted by the transformer would meet both the City of North Bend's and the King County's noise ordinances. With respect to vegetation removal between noise producing sources, such as I-90 and North Bend Way, the environmental noise analysis undertaken by MFG, Inc., and contained in Appendix B of this environmental document, indicates that although their would be a slight increase in decibel levels to receiving properties, the increase would be so small as to be imperceptible to the residents who reside there (see Section 3.12 Noise and Radio/TV Interference and Appendix B of this EA).

Comment 3.12-2: *Would like more information on references sited in noise study.*

Response: The first three references sited in the environmental noise analysis contained in Appendix B are essentially textbooks, and should be available at the University of Washington bookstore. The relevant pages are page 184 of Noise and Vibration Control, page 134 of Noise and Vibration Control Engineering, Principles and Applications, and page 318 of Handbook of Acoustics.

The last two references would likely be more difficult to find. The reference for "Highway Noise Fundamentals" is part of the course material from a class taught by the FHWA (Federal Highway Administration) called Fundamentals and Abatement of Highway Traffic Noise. The commentor may be able to contact the Washington State Department of Transportation (WSDOT) to see if s/he can get information on the course or course materials. The relevant pages are 107 and 108. The reference "FHWA Traffic Noise Model User's Guide" is part of the user's manual for the newest FHWA-approved Traffic Noise Model (TNM). More information on the model is available at the Web site http://www.fhwa.dot.gov/environment/fhwa-tnm.htm or by calling the FHWA or WSDOT. The relevant pages here are 87-88.

Comment 3.12-3: Clanging noise from steel tower on BPA Rocky Reach-Maple Valley

345-kV line (dead-end tower off of Cedar Falls Road) (10:30 -11:30) PM.

Response: This noise could have been emitted from emergency repair or from some unauthorized person/persons tampering with the tower or related transmission facilities. We will look into the matter if no authorized BPA personnel had need to be on the tower at that time. BPA appreciates this information.

Comment 3.12-4: A high variability in results of studies of attenuation of noise by trees was acknowledged in the EA. Thus, the use of the ISO 9613-2 standard to estimate attenuation may not accurately assess the conditions under consideration here. The natures of the foliage and surrounding terrain are likely factors. Also, only a removal of fifty feet of vegetation was considered in the estimate for most of the line, but removal of danger trees outside of this zone would increase the impact beyond the 1 to 3 dB increase due to loss of the 50 feet of vegetation. What mitigation would be offered if the estimate is wrong and the increase in noise level of traffic is discernible? The potential for impact is underestimated.

Also the EA assumes no change in the source of noise (road traffic), but by enabling further development, the new power line would contribute to an increase in traffic and a high average noise level at the source (a double whammy).

Response: Although there is a variability in estimates of noise reduction due to trees, most studies maintain that vegetation does little to reduce noise unless the stand of trees is very deep (30 m [100 feet] or more) and so dense as to prevent seeing through it. The stand of trees and vegetation that would be removed as part of this project is approximately 15 m (50 feet) deep. In addition, the roadway is visible through the trees and vegetation at most locations. Therefore, no substantial reduction in traffic noise is occurring now due to these trees and other vegetation, and the estimate 1 to 3 dBA increase in noise due to its removal used in the impact analysis should be considered a conservative estimate.

Removal of additional individual danger trees would be unlikely to result in any increase in sound level over what would occur due to removal of 15 m (50 feet) of vegetation. The danger trees are widely spaced and would not comprise a noise or visual barrier between the roadway and nearby residences. Although nearby residents may perceive a change in the traffic noise following clearing for the proposed project, this could be due to a slight shift in the frequency spectrum of the noise or could be due to a change in attitude towards the source due to the removal of a visual barrier. Either way, a perceived increase in traffic noise (whether measurable or not) would not necessarily indicate a significant noise impact. The Washington Department of Transportation defines a substantial increase (and resulting impact) as an increase of 10 dBA. Removal of 15 m (50 feet) of trees ands some additional scattered danger

trees would not result in anything close to 10 dBA increase, and therefore, would not result in a significant adverse noise impact.

It should also be noted that the proposed project would not increase traffic volumes and related traffic noise on local roadways or on I-90.

ENVIRONMENTAL CONSULTATION AND PERMIT REQUIREMENTS (CHAPTER 4)

Comment 4-1: All development proposals that would add more than 5,000 square feet of new impervious surfaces, would construct or modify a drainage system that collects or concentrates surface water and stormwater runoff, or that contains, or is adjacent to, a floodplain, stream, lake or wetland or other sensitive area defined in KCC 21A.24, are required to develop detailed engineering plans and technical supporting information to satisfy the eight core requirements outlined in the King County Surface Water design manual (KCC 9.04.040).

Since the proposed transmission line would cross or is adjacent to numerous sensitive areas (streams, wetlands and wetland buffer areas), would likely exceed the minimum threshold criteria, and collect and concentrate surface water from road construction, an engineered drainage analysis should be prepared for the proposal addressing the eight core requirements in the King County Surface Water Design Manual referred to above.

Response: BPA would comply with the King County requirement, should BPA chose to go forward with the proposed project.

Comment 4-2: Many of King County's development codes are directed at preserving the natural environment, protecting sensitive areas such as streams and wetlands, reducing flooding and minimizing impacts to water quality. Although these comments are by no means an exhaustive list of issues, as they pertain to your transmission line project, they do highlight the lack of information contained in your EA, as it relates to King County development and zoning standards.

Response: BPA, as an agency of the Federal government is not normally subject to local land use regulations, including zoning and development standards. BPA is also not subject to the Washington State Environmental Policy Act, however, BPA does strive to meet or exceed state and local development regulations where practicable. BPA is subject to federal environmental law and also the National Electric Safety Code in designing and constructing its facilities. The National Electric Safety Code requirements for minimum electrical clearances for high-voltage transmission lines are often at odds with local development regulations.

With respect to the comment of lack of information on zoning standards, the Preliminary EA (page 46) correctly stated that transmission lines are a permitted use in the zoning districts crossed by the proposed project in unincorporated King County. These are the UR (Urban Reserve) and RA-5 (Rural-Agricultural, five acre minimum) zones.

Comment 4-3: King County Department of Development and Environmental Services (DDES) has identified numerous sensitive areas as defined by King County Code (KCC) Chapter 21 A24, along the proposed transmission line routes.

Response: BPA is aware of the sensitive areas crossed by the proposed transmission line. These include wetlands, wetland buffer areas, streams and areas of steep slopes.

Comment 4-4: The City of North Bend Sensitive Area regulations (NBMC 14.10) should be listed under the City of North Bend Plans and Ordinances. Gardiner Creek is a Category 2 stream with salmonids (NBMC 14.10.230) requiring a 100 foot buffer (NBMC 14.10.070). The EA should address compliance with the sensitive area ordinance and note the need to seek a public agency or utility exception (NBMC 14.10.070) where compliance is not feasible.

Response: BPA is not required to apply for a public agency or utility exception because it is a Federal agency. While the agency is prevented from complying with the City's procedural requirements under Title 14 of the City's Municipal Code, it strives to meet or exceed local government's substantive standards. The substantive standards are outlined in Title 14.10.070 of the City of North Bend Municipal Code.

While BPA tries to avoid all sensitive areas when siting its electrical facilities, it also realizes that linear facilities cannot always circumvent these areas. Depending on the size and configuration of the sensitive area encountered, it is often possible to span these areas, if the requirements of the National Electrical Safety Code could also be achieved. BPA will leave any vegetation cut for wildlife habitat and would use best management practices (BMPs) to ensure that no sediments would reach surface waters in measurable quantities. BPA would also reseed all disturbed areas following the cessation of construction activities and leave erosion control devices in place until the site stabilized. BPA would comply to the maximum extent practicable with the local government agency's substantive requirements.

Comment 4-5: City of North Bend Road Standards: The City of North Bend does have road standards outlined in NBMC 19.08 but they do not address construction of electric transmission lines.

Response: BPA has corrected this information in the Final EA, and appreciates this information.

Comment 4-6: City of North Bend Design and Construction Standards for Electrical and Street lighting. North Bend Municipal Code, Chapter 19.06 addresses burying wiring for all new utilities. A determination will need to be made concerning the application of this code to the new transmission line.

Response: With respect to undergrounding all or a portion of the line, BPA considered this but has rejected this alternative as not meeting one of the project purposes, i.e., constructing the proposed project in a cost-effective manner. See Section 2.3 of the EA, "Alternatives Considered but Eliminated," specifically Section 2.3.2 "Underground Alternative," and also response to Comment 4-4. This is an exception recognized under Washington law.

Comment 4-7: Forest Practices: The proposed route (would) require some logging and clearing of new right-of-way, as well as removal of certain select "danger trees," in or adjacent to the proposed right-of-way. KCC 16.82 (clearing /grading) defines standards for clearing and forest practice, which are those involving removal of greater than 5,000 board feet of merchantable timber as conversions. Clearing and forest practice standards include, but are not limited to, sensitive areas, critical drainage areas, wildlife habitat corridors, and community and basin plans. In addition, Class IV - General Forest Practices are subject to forest practice emergency rules adopted March 20, 2000. The EA does not address clearing or forest practice standards as defined in KCC 16.82.

Response: BPA proposes to cross a number of sensitive areas between the tap point and the proposed substation site. Sensitive areas are difficult to avoid in siting linear facilities such as transmission lines. Section 16.82.150 of the King County Code, entitled, Clearing Standards, allows certain uses under a clearing permit. While BPA is prevented from seeking a clearing permit from the King County Department of Development and Environmental Services, under the Federal Supremacy Clause of the U. S. Constitution, BPA meets the substantive requirements of the County Code since the proposed transmission line meets the test of it being "within or adjacent to existing road or utility easements whenever possible."

Comment 4-8: Many of King County development codes are directed at preserving the natural environment, protecting sensitive areas such as streams and wetlands, reducing flooding, and minimizing impacts to water pertain to your transmission line project, they do highlight the lack of information contained in your environmental assessment as it relates to King County development and zoning standards.

Response: As an agency of the federal government, BPA is also interested in protecting sensitive areas and the natural environment. In siting linear facilities, BPA first tries to avoid sensitive areas where these areas can be avoided. Where they

cannot, BPA tries to span them where possible. Where they cannot be spanned, BPA attempts to minimize the impacts. BPA also attempts to meet and exceed these state and local environmental regulations, where possible.

BPA has prepared this environmental assessment under the National Environmental Policy Act of 1969, as amended, using the implementing procedures established by the U.S. Department of Energy. These implementing regulations require that EAs be concise environmental documents that either lead to a finding of non-significance or to a finding of significance.

OTHER

Comment 1: What is the status of the project?

Response: BPA has made a Finding of No Significant Impact and now will choose between the proposed action and the no action alternative. Should BPA choose the proposed action, appraisals would be conducted, the land would be acquired, contract specifications would be developed, materials would be ordered, and bids would be solicited from qualified contractors. Beyond that, a contractor would be retained, clearing and access road construction would be undertaken and the transmission line built.

Comment 2: No reference to contacts for City of Snoqualmie, Chapter 5.

Response: Chapter 5 is entitled Persons and Agencies Consulted. BPA listed the names of the landowners and identified the federal, state and local government agencies contacted during the course of the analysis. However, the names of the individuals within each of the government agencies contacted were not listed. BPA consulted with two individuals within the City of Snoqualmie during its environmental review: the City Attorney, Pat Anderson, and the Planning Director, Nancy Tucker. BPA has added the City of Snoqualmie to the list.

Comment 3: Wanted herbicide for the Echo Lake-Monroe line on their property.

Response: This request was forwarded to the right-of-way maintenance specialist in the area.

Comment 4: *I want to meet with the road designer on site.*

Response: BPA would be happy to arrange a meeting between the landowner and the road designer at the landowner's convenience.

Comment 5: Why can't the access roads come from the freeway side?

Response: I-90 is a limited access highway in Washington State. As such, the only way to enter and exit the freeway would be at exits and on-ramps. The state has adopted this policy to limit the number of access points to the freeway to maintain the health and welfare of the traveling public.

Comment 6: Why don't we use the game tunnel for the access road? What happened to the access road choices?

Response: BPA may use the game tunnel to access the State I-90 right-of-way from the south side of the freeway. If the game tunnel would be used, BPA would obtain the necessary permits to do so from the Washington State Department of Transportation.

Comment 7: Why do we do an EA rather than an EIS?

Response: Although BPA can prepare an EIS on any proposed action at any time, BPA has prepared an environmental assessment for the purpose of determining if an EIS would be necessary. Since BPA has made a finding that, with mitigation, the proposed action would not create any significant environmental impacts, an EIS does not need to be prepared.

Comment 8: Wanted to know where their property line is between them and their neighbor.

Response: This request is outside of the scope of the project. The property owner needs to either consult with the neighbor who may already have this information with respect to their common property line. If the neighbor has no information here, a survey may be needed.

Comment 9: It is no skin off of their noses to go through condemnation. They will learn from the experience and it might be entertaining.

Response: Comment noted.

Comment 10: Landowner wants to know the size of the easement and any access roads whose rights would be acquired.

Response: BPA would acquire a 15 m (50-foot) wide right-of-way to construct the proposed transmission line on private property. Additional rights may need to be acquired where existing access roads lie outside of the proposed right-of-way.

Comment 11: Puget tried to shove the line down their throat. Thinks Puget offered only \$2,000 but did not remember the exact amount.

Response: As discussed in the Preliminary EA, BPA pays fair market value for land rights acquired from private landowners. The value of any rights secured would be established during the appraisal process.

Comment 12: They will negotiate, but history to them is delay. The development behind them as been delayed again, for the fifth time. And that is their victory. Knows they can't stop it, but they can delay it.

Response: Comment noted.

Comment 13: *What are the rates?*

Response: Both Tanner and Puget's rates have been set on sliding scales, however, the more power Tanner's customers use, the less they pay, while the more Puget's customers use, the more they pay. Tanner's rates are 5.2 cents per kWh (kilowatthour) for the first 10,000 kWhs per month, 4.9 cents per kWh for the next 10,000 kWhs used, and 3.9 cents per kWh thereafter.

In addition to how much power is used, Puget's rates also fluctuate by time of year. Although Puget has different rate schedules, the rates for residential service (Schedule 7) are 6.0 cents per kWh for the first 600 kWh used between October and March, and 7.5 cents per kWh for each kWh thereafter within the monthly billing cycles. For the 6-month period between April 1 through September 31, Puget charges 6 cents per kWh for the first 600 kWh used and 6.9 cents for each kWh used thereafter.

Comment 14: By expanding Tanner's service, the rates per customer will go down; landowners not realizing benefit.

Response: The proposed action would not cause a reduction in rates to Tanner's customers. However, because of the proposed action, their rates would be under less pressure to escalate in the future due to a constricted supply. The proposed action should benefit both Tanner's and Puget's customers over the long term, since the

proposed substation and transmission line are designed to serve both utilities customers well into the third decade of the 21st century.

Comment 15: Who is the decisionmaker in this process?

Response: The decisionmaker would be the senior vice president for BPA's transmission business line, Mark Maher.

Comment 16: *Is the only public input this front-end process providing comment on the EA?*

Response: If BPA chooses to go forward with this project and proceeds to construction, BPA staff will continue to be available to meet and work with individual landowners and public officials.

Comment 17: *If the line is ever sold, there should be an understanding that mitigation plantings be preserved.*

Response: Comment noted.

Comment 18: Surveys cut large swath of vegetation rather than triangulating. Large old growth stumps were leveled; these were stumps with ledger board holes in them, indicative of earlier logging practices commonly used with the crosscut saws.

Response: BPA regrets that these stumps were removed in surveying for the line.

Comment 19: This project does not follow the standard review process for local projects. There is no independent party that can look at all of the information and make a decision. Public hearing is lacking. This is an internal process for BPA with "some" public input.

Response: The commentor is correct, federal projects do not follow the standard review process for local projects. The commentor is also correct in stating that there is no *independent* party that can look at all of the information and make a decision. The environmental analysis group within BPA's Office of Environment, Fish and Wildlife, and independent contractors conducted the environmental analysis that was undertaken on the proposed action. While it could be stated that BPA employees who were involved in the work are not "independent," they did undertake an objective environmental review of the action, as proposed, and concluded that, with mitigation, no significant environmental impacts on the human environment would be created by project implementation (see enclosed FONSI). BPA obtains its authority from a

number of acts of federal legislation including the Bonneville Project Act, the Pacific Northwest Electric Power Planning and Conservation Act, the Federal Columbia River Transmission System Act of 1974, and the Department of Energy Organization Act of 1993, et al.

With respect to the commentor's statement that this is an internal process for BPA with "some" public input, BPA disagrees. As an agency of the Federal government, BPA is subject to the National Environmental Policy Act of 1969, as amended, on all major decisions with may have an adverse (or beneficial) affect on the environment. BPA undertook an environmental assessment under NEPA, with an extensive public involvement effort. BPA staff held one-on-ones early on with the affected government agencies and affected landowners. BPA adjusted the proposed project route, based on public input, and published and disseminated an environmental assessment for public and agency review and comment. BPA also held an open house mid-way through the comment period to take comments on the draft environmental document as well as make staff available to respond to questions or to provide additional environmental information. The final environmental assessment responds to the comments received; revisions to the preliminary environmental assessment have been made based on public and agency input. See also response to Comment 16.

Comment 20: Who is held accountable with respect to mitigation? There is no oversight to make sure all mitigation is done.

Response: BPA, as a federal government agency, is accountable for its own actions or inaction, and the agency holds the contractor accountable for its actions or inaction's, where a contractor is retained to do work for Bonneville, at Bonneville expense.

Comment 21: Need a group of impacted landowners who would assess whether BPA mitigated what it said it would in the EA.

Response: Comment noted. The formation of such a committee would be up to the interested parties.

Comment 22: Will all of the comments be included in the Final EA?

Response: The Final EA includes all of the comments on the Preliminary EA received during the review period, including any that came into the agency following the completion of the review period and prior to the publication of the Final EA. The comments came into the agency via the postal service, e-mail messages, phone calls and during public meetings and interviews.

Comment 23: *Need a bridge between the BPA and the affected landowners. You'd have much fewer irate calls.*

Response: BPA welcomes open dialog between affected communities where the need for additional transmission facilities and concerned citizens coincide. BPA believes strongly in involving the public in agency decision-making where the public would be affected by the proposed facilities. BPA tries to be a good neighbor to the public when siting future facilities necessary for the continued safe and reliable operation of the power system in the Northwest, and in meeting our obligations and in achieving our public purposes as the sole federal power marketing agency here in the Northwest. The individuals most closely associated with the proposed action would be the project manager, the project engineer, and the land representative. The project environmental lead is also available to entertain any questions/concerns of an environmental nature related to the proposed project.

Comment 24: How many other things can be built under the transmission lines? Cable, phone, other distribution lines?

Response: Before any utilities could hang any facilities on BPA poles, they would need to get permission to do so from the underlying property owner on private property. With respect to public rights-of-way, this permission would emanate form the land manager, such as the state or local government agencies (King County or City of North Bend).

Comment 25: It bothers me that late July is the Final EA, and late July is the final decision that doesn't allow for public input.

Response: Following the release of the Final EA/FONSI, BPA would be in a position to make a decision between the "action" and the "no action" alternative. A FONSI is an acronym for a "finding of no significant impact." BPA must make this finding before going forward with any action requiring an environmental review that would not be considered a major federal action. It is likely a decision would be made on the proposed action within the next week or so.

Comment 26: Interesting to see that Puget wanted to start work within one year of notice of project when they were doing it, and when we (BPA) comes in, it takes two (plus) years.

Response: As a federal government agency, BPA must undertake an environmental review on any action which could have an adverse (or beneficial) affect on the

environment, under the National Environmental Policy Act (NEPA) of 1969, as amended. This level of federal legislation typically takes longer to complete than local government environmental reviews. In addition, BPA is subject to other federal legislation that private utilities, such as Puget Sound Energy are not subject to. These would include such legislation as the Historical Preservation Act, the Endangered Species Act, et al.

Comment 27: Existing 500-kV tower access cell antennas. Going in and out and too many locks interfere with livestock.

Response: Comment noted.

Comment 28: What are the types of gates available?

Response: BPA installs three types of gates on its access roads, all of which are 3 1/2 m (12 feet) wide. Two of the gates are made of tubular steel, one of which is wrapped in wire mesh. The other is made from steel panels.

Comment 29: Requests that any leftover soil from construction be dumped in their back yard.

Response: The project manager/engineer would know if any leftover soil would be available should BPA decide to construct the project. BPA would contact the landowner as soon as this information would be available.

Comment 30: The Preliminary EA does not adequately address impacts related to human health, environmental impacts related to removal of trees and other vegetation, aesthetics and property value impacts, all of which could be avoided by burying the line. And because burying the line is technically feasible, the commentor requests that BPA conduct a study as to the costs and feasibility of burial of the line in whole or in part. Burying the line would retain vegetation, preserve the aesthetics of the area, and avoid the adverse health impacts of locating the line close to the homes on Alm Way.

Response: Undergrounding transmission lines is technically feasible, and has been undertaken in many areas of the country. In response to a request by a resident within the project area near 372nd, BPA looked at undergrounding a portion of the line along North Bend Way, and discussed its findings in Section 2.3.2 of the preliminary EA. While technically feasible, it was dropped from further consideration due to costs.

With regard to the statement that the Preliminary EA did not adequately address impacts related to human health, environmental impacts related to clearing, aesthetics

and property values, BPA is undertaking this EA under the National Environmental Policy Act of 1969, as amended, receiving guidance on the content and length of such environmental documents from the Department of Energy. DOE's guidance recommends that EAs be concise, tailored to the proposed action, and normally not exceed 20 to 30 pages in length. BPA has attempted to undertake a complete environmental review of the proposed action without incorporating too much extraneous detail in the document.

Comment 31: Because of the enormity of the adverse health effects, as well as environmental, aesthetic and property value impacts, the proposed project would have on the Snoqualmie Valley Community, I respectfully request that a full environmental impact statement (EIS) be prepared before this project goes forward.

Response: BPA has prepared an environmental assessment on the proposed action to determine if the action, as proposed, would create any significant environmental impacts. None were found, so BPA has prepared this Final Environmental Assessment/Finding of No Significant Environmental Impact, and will soon make a decision on whether to select the Proposed Action, or the No Action Alternative. No EIS will be prepared.